

# **Exhibit K1**

**Atkinson-Baker, Inc.**

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1               \*\*\*\*\* C O N F I D E N T I A L \*\*\*\*\*

2               IN THE UNITED STATES DISTRICT COURT

3               FOR THE SOUTHERN DISTRICT OF NEW YORK

4               - - -

5     EASTERN PROFIT CORPORATION,                      )  
6     LIMITED,    )  
7     ) Plaintiff/Counterclaim Defendant,            )  
8     )    )  
9     ) v.    ) Case No.  
10    STRATEGIC VISION US, LLC,                      ) 18-cv-2185  
11    )    ) (JGK)  
12    ) Defendant/Counterclaim Plaintiff. )  
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16

DEPOSITION OF

17

LIANCHAO HAN

18

WASHINGTON, D.C.

19

AUGUST 28, 2019

20

ATKINSON-BAKER, INC.

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REPORTED BY: CATHERINE B. CRUMP

FILE NO. AD07997

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<p>1 [Han Exhibit No. 1 was 09:25      2 marked for identification.] 09:25      3 BY MR. GREIM: 09:25      4 Q. I'll show you what's been marked as Han 09:25      5 Exhibit 1, and you'll see it starts off with a letter 09:25      6 from your attorney, Mr. Gavenman, that takes up the 09:25      7 first two pages and then there are a total of four 09:25      8 Bates-labeled pages. Do you see that? 09:25      9 A. Yeah. 09:25      10 Q. Are those four pages the documents that 09:25      11 you gave to your attorney to produce to me? 09:25      12 A. Yes. 09:25      13 Q. And the redaction, I take it, is just 09:25      14 your communication with your counsel about what is 09:26      15 below; is that right? 09:26      16 A. Yes. 09:26      17 Q. Okay. Now, this morning, you also 09:26      18 produced a folder of hard copy documents; is that 09:26      19 right? 09:26      20 A. Yes. 09:26      21 Q. Okay. We are looking at those and we'll 09:26      22 cover those later after we have a chance for a break. 09:26   </p>	<p>1 A. No. 09:27      2 Q. No. Why did you set your -- 09:27      3 A. I was searching for all the text 09:27      4 messages and I noticed my Signal with Mike and French 09:27      5 is not set correctly. Sometimes, you know, it 09:27      6 changes. So I set it to 10 seconds. 09:27      7 Q. What was it set to before 10 seconds? 09:27      8 A. Before, I set it usually automatically 09:27      9 just erase it after read. 09:28      10 Q. Did you have any communications with Mr. 09:28      11 Guo that you did not produce? 09:28      12 A. No. With Mr. Guo, we don't use Signal. 09:28      13 Q. What do you use to communicate with Mr. 09:28      14 Guo? 09:28      15 A. With What's App. WhatsApp, I also 09:28      16 automatically to delete it whenever I read the 09:28      17 message. Can I add? 09:28      18 MR. GAVENMAN: Sure. 09:28      19 BY MR. GREIM: 09:29      20 Q. Sure. 09:29      21 A. For this particular project, at the very 09:29      22 beginning, we all agreed we're not -- everything has 09:29   </p>
<p style="text-align: center;">Page 14</p> <p>1 Okay? 09:26      2 A. Okay. 09:26      3 Q. I want to ask you do you have -- I have 09:26      4 mentioned to your counsel the other day that I 09:26      5 thought you may have text messages. Did you search 09:26      6 for and find any text messages or Signal messages 09:26      7 with either Ms. Wallop or Mr. Waller? 09:26      8 A. All the messages are deleted. It said 09:26      9 automatically deleted. I don't have any. 09:26      10 Q. Now, I will represent to you that when 09:26      11 you use Signal and you change the settings on 09:27      12 there -- 09:27      13 A. Correct. 09:27      14 Q. -- it tells everybody else your 09:27      15 contacts. 09:27      16 A. Yes. 09:27      17 Q. And so, yesterday, I believe we saw a 09:27      18 notice that you had changed the settings to 10-second 09:27      19 delete. Now, is that correct? Did you do that? 09:27      20 A. That's correct. 09:27      21 Q. But your testimony -- well, let me ask 09:27      22 you. That's not what deleted the messages, is it? 09:27</p>	<p style="text-align: center;">Page 16</p> <p>1 to be in person, face-to-face meeting, no digital 09:29      2 transmission of any sort of documents. 09:29      3 Q. And why was that? 09:29      4 A. Because everybody agreed to keep secret. 09:29      5 So we don't communicate on the digital platform 09:29      6 whatsoever. 09:29      7 Q. However, do you recall that, in fact, 09:29      8 some text communications did occur between you and 09:29      9 Ms. Wallop and Mr. Waller? 09:29      10 A. I don't remember. 09:29      11 Q. Okay. 09:29      12 A. If there is, it must be very vague. I 09:29      13 don't think we discussed that directly. 09:29      14 Q. Specifically, have you had 09:30      15 communications with Ms. -- well, let me back up. 09:30      16 Have you had communications with Mr. Guo about 09:30      17 this case? 09:30      18 A. Let me think about this. 09:30      19 He called me on WhatsApp, blamed Mike and 09:30      20 French as a fraud, cheated him, and there was one 09:30      21 situation, one time, that his supporters started 09:30      22 about getting ready to attack me personally because I 09:31</p>

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<p>1 introduced Mike and French to Miles. Miles feel like 09:31      2 he is cheated by them. So when I learned the 09:31      3 supporters are about to attack me personally, I sent 09:31      4 him a message and I said how can you, you know, let 09:31      5 your supporters do this to me. 09:31</p> <p>6 So he called me back and discussed and we 09:31      7 argued, you know, for quite a while and then, you 09:31      8 know, just ended that. He kept asking me who gave 09:31      9 you that information, who tell you that my supporters 09:31      10 are going to attack you personally. I said I won't 09:31      11 be able to tell you that, and he pressured me many, 09:32      12 many times. I refused to tell him. 09:32</p> <p>13 So when it ended, that's the only time we 09:32      14 discussed this, and a few times when I was in his 09:32      15 office, he mentioned about it as well, but we 09:32      16 obviously have different views about our perception. 09:32</p> <p>17 <b>Q. The longer discussion that you just</b> 09:32  <b>testified to --</b> 09:32</p> <p>18 A. Yeah. 09:32</p> <p>19 <b>Q. -- was this after the lawsuit was filed?</b> 09:32</p> <p>20 A. I don't know when this lawsuit was 09:32      21 filed. So I have no idea if it was before or after. 09:32</p>	<p>1 platform. 09:34</p> <p>2 <b>Q. Have you received any sort of threats</b> 09:34  <b>from Yvette Wang or Mr. Podhaskie, sitting here today</b> 09:35  <b>on behalf of Golden Spring?</b> 09:35</p> <p>3 A. No. 09:35</p> <p>4 MR. GRENDI: Objection to form. 09:35</p> <p>5 BY MR. GREIM: 09:35</p> <p>6 <b>Q. Let me ask you have you had any</b> 09:35  <b>communications with Mr. Podhaskie here before today?</b> 09:35</p> <p>7 A. I did. 09:35</p> <p>8 <b>Q. What were those communications?</b> 09:35</p> <p>9 A. Mostly focused on the case against Clark 09:35      10 Hill. He asked me -- he's bothering me, actually, 09:35      11 about, you know, the case and I have been giving my 09:35      12 accounts five, six times to different lawyers. I 09:36      13 just got really tired of that. He pressured me for 09:36      14 giving more. So that's why we were back and forth 09:36      15 about it. 09:36</p> <p>16 <b>Q. I'm sorry. What was the Clark Hill</b> 09:36  <b>case?</b> 09:36</p> <p>17 A. Clark Hill case is Miles is suing them, 09:36      18 is about maybe suing them for his political asylum, 09:36</p>
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1	<b>information about the Clark Hill matter? What was</b>	09:38	1	colleagues that agree with me, we try to persuade him	09:40
2	<b>your involvement?</b>	09:38	2	not to pursue it, and that was the earliest	09:40
3	A. I was helping Miles for his asylum case.	09:38	3	discussion. Of course, he won't listen to me and I	09:40
4	<b>Q. So then you had interaction with the</b>	09:38	4	tried a few more times this, and then I don't think	09:41
5	<b>Clark Hill lawyers?</b>	09:38	5	he was -- you know, there's no way he agreed with me.	09:41
6	A. Correct.	09:38	6	So that was that.	09:41
7	<b>Q. How do you know that Chinese hackers did</b>	09:38	7	Then, later, I think we discussed. He didn't	09:41
8	<b>hack the Clark Hill law firm?</b>	09:38	8	discuss specifically about the case at all. He kept	09:41
9	A. Clark Hill told me.	09:38	9	saying French and Mike are frauds, cheated him, which	09:41
10	<b>Q. Do you believe them?</b>	09:38	10	we always have a different view on that. I disagree	09:41
11	A. Of course.	09:38	11	with him on that. So we argued back and forth. So	09:41
12	<b>Q. Okay. Let me ask about -- you mentioned</b>	09:38	12	that pretty much was our main conversation about the	09:41
13	<b>a couple of different conversations with Mr. Guo</b>	09:39	13	case, whether they're cheating him or not.	09:41
14	<b>about this case.</b>	09:39	14	<b>Q. Why do you disagree?</b>	09:41
15	A. Yes.	09:39	15	A. Because I think everybody comes in with	09:41
16	<b>Q. We talked about the longer conversation</b>	09:39	16	a good intention at the beginning.	09:42
17	<b>and then you said you met with him a few more times</b>	09:39	17	<b>Q. Who are the colleagues of Mr. Guo's that</b>	09:42
18	<b>in the office.</b>	09:39	18	<b>agreed with your position early on?</b>	09:42
19	A. Yes.	09:39	19	MR. GAVENMAN: Objection to form.	09:42
20	<b>Q. Now, whose office was that?</b>	09:39	20	Go ahead.	09:42
21	A. Miles' office.	09:39	21	THE WITNESS: At the meeting was his --	09:42
22	<b>Q. Where is that office?</b>	09:39	22	Victor Cedar and William Yu. Williams, he's a	09:42
		Page 22			Page 24
1	A. I think at -- what is that? 62 -- 64	09:39	1	manager, I think.	09:42
2	Street of New York.	09:39	2	BY MR. GREIM:	09:42
3	<b>Q. 64th Street on the upper east side?</b>	09:39	3	<b>Q. Is this William Je, J-E?</b>	09:42
4	A. Yeah.	09:39	4	A. J-E? I think Yu. Right? No.	09:42
5	<b>Q. Are those also the Golden Spring</b>	09:39	5	I don't remember his last name, but he was --	09:42
6	<b>offices?</b>	09:39	6	he was -- I remember he was at the meeting. He also	09:43
7	A. That, I don't know.	09:39	7	agreed with me not to pursue this case, because we --	09:43
8	<b>Q. When did those meetings occur, to the</b>	09:39	8	yeah. I predict what's going to happen exactly like	09:43
9	<b>best of your recollection?</b>	09:39	9	what's happening right now.	09:43
10	A. That's hard to know. I think maybe two	09:39	10	MR. GRENDI: I'm sorry. What was the name of	09:43
11	months ago, there was one, or three months ago and	09:39	11	the first individual?	09:43
12	then early -- I have been there maybe three, four	09:40	12	THE WITNESS: Victor.	09:43
13	times.	09:40	13	MR. GRENDI: Sorry. I was asking the court	09:43
14	<b>Q. Does Mr. Guo ask for your advice about</b>	09:40	14	reporter. I apologize.	09:43
15	<b>this case?</b>	09:40	15	MR. GREIM: That's okay. I was going to ask	09:43
16	A. No.	09:40	16	anyway.	09:43
17	<b>Q. What did you discuss with him about the</b>	09:40	17	MR. GRENDI: Okay. Fair enough.	09:43
18	<b>case? Let's start with the earliest meeting that you</b>	09:40	18	BY MR. GREIM:	09:43
19	<b>can remember.</b>	09:40	19	<b>Q. Victor, what was his last name?</b>	09:43
20	A. I think at the beginning, I strongly	09:40	20	A. Cedar. Cedar. Correct?	09:43
21	advised when he mentioned he's going to sue French	09:40	21	<b>Q. Was he at Foley, Hogue?</b>	09:43
22	and Mike, I opposed the idea. I also got his	09:40	22	A. No. He is a solo practitioner.	09:43
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1	<b>Q. Could you spell his last name?</b>	09:43	1	<b>Vision would likely counterclaim against him?</b>	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	<b>Q. What did you understand that William's</b>	09:43	4	difficult situation that will jeopardize your	09:46
5	<b>position was with Mr. Guo?</b>	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	<b>Q. Did you ever speak with Yvette Wang, who</b>	09:47
7	<b>Q. Do you know if he is the director of a</b>	09:44	7	<b>is sitting here at the table, about the lawsuit?</b>	09:47
8	<b>company called ACA?</b>	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	<b>Q. Do you know what role she plays for Mr.</b>	09:47
10	<b>Q. Have you heard of that company, ACA or</b>	09:44	10	<b>Guo?</b>	09:47
11	<b>ACA Capital Group Limited?</b>	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	<b>Q. What is that?</b>	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	<b>Q. This William Yu --</b>	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	<b>Q. -- where does he live?</b>	09:45	22	her out, put me back in.	09:48
	Page 26			Page 28	
1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	<b>Q. Does he have a role with McQuary Capital</b>	09:45	3	observation.	09:48
4	<b>Group? Does that sound familiar?</b>	09:45	4	<b>Q. Well, have you heard of an entity called</b>	09:48
5	A. I don't remember. Is that Australian?	09:45	5	<b>Golden Spring New York or Golden Spring Hong Kong?</b>	09:48
6	<b>Q. It is.</b>	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	<b>Q. When the last time you saw William?</b>	09:45	9	<b>Q. Do you know whether Ms. Wang has a role</b>	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	<b>with either of the Golden Spring entities?</b>	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	<b>Q. I want to go back now. I just want to</b>	09:46	12	THE WITNESS: I didn't.	09:48
13	<b>make sure we cover this. Is there anything else that</b>	09:46	13	BY MR. GREIM:	09:48
14	<b>you discussed with Mr. Guo in these meetings in his</b>	09:46	14	<b>Q. Why was it that Ms. Wang -- well, let me</b>	09:48
15	<b>office --</b>	09:46	15	<b>back up.</b>	09:48
16	A. Yeah.	09:46	16	<b>Why do you say Ms. Wang was originally</b>	09:48
17	<b>Q. -- about the case that we haven't</b>	09:46	17	<b>excluded from the discussion?</b>	09:49
18	<b>covered yet?</b>	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	<b>Q. Did you tell Mr. Guo that Strategic</b>	09:46	22	system.	09:49

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1	<b>Q. What do you mean, "within the system"?</b>	09:49	1	<b>him with his various efforts to obtain political</b>	09:52
2	A. With the communist, work for the Chinese	09:49	2	<b>asylum from that point forward?</b>	09:52
3	Government. I didn't know the source, but I just	09:49	3	A. Correct.	09:52
4	didn't remember if he said that in the meeting or	09:49	4	<b>Q. What was your initial impression of Mr.</b>	09:52
5	later, but that's my impression.	09:49	5	<b>Guo?</b>	09:52
6	<b>Q. Well, let me back up for a second. When</b>	09:49	6	A. I think he's a genuine warm person. He	09:52
7	<b>did you first remember meeting her?</b>	09:49	7	has a deep knowledge of how the communist system	09:53
8	A. Meeting Yvette?	09:50	8	works and he has a reason to expose the high-ranking	09:53
9	<b>Q. Um-hum.</b>	09:50	9	government officials that are corrupt and, also, he	09:53
10	A. I think maybe two years ago.	09:50	10	has many defects of the people from the communist	09:53
11	<b>Q. Okay. So it would be late summer of</b>	09:50	11	system.	09:53
12	<b>2017?</b>	09:50	12	<b>Q. What do you mean by that?</b>	09:53
13	A. It will be August or September. August,	09:50	13	A. Like --	09:53
14	most likely, yeah, August.	09:50	14	MR. GRENDI: Objection to form.	09:53
15	<b>Q. How are you able to remember that time?</b>	09:50	15	THE WITNESS: He probably won't tell you	09:53
16	A. That was political asylum. Miles tried	09:50	16	exactly what he thinks. Sometimes he exaggerates	09:53
17	to -- that's why we were introduced to him and he did	09:50	17	what he's done and stuff like that.	09:53
18	help him with his political asylum. Yeah.	09:50	18	BY MR. GREIM:	09:53
19	<b>Q. What I should have asked you in the very</b>	09:50	19	<b>Q. So you met Ms. Wang, then, within about</b>	09:53
20	<b>beginning was when did you first meet Mr. Guo?</b>	09:50	20	<b>a month or so of having met Mr. Guo himself?</b>	09:54
21	A. I think it's either July or August,	09:50	21	A. Correct.	09:54
22	early August or, you know, late July of 2017.	09:50	22	<b>Q. Did your impression of Mr. Guo change</b>	09:54
				Page 30	Page 32
1	<b>Q. And who introduced you?</b>	09:50	1	<b>over time?</b>	09:54
2	A. His name is Jonathan Ho. The Chinese	09:51	2	A. No.	09:54
3	name is Chen Jun.	09:51	3	<b>Q. Do you consider yourself to be a</b>	09:54
4	<b>personal friend of Mr. Guo?</b>	09:54	4	<b>personal friend of Mr. Guo?</b>	09:54
5	A. Correct.	09:51	5	A. That's a very --	09:54
6	<b>Q. Jonathan Ho. Who is Jonathan Ho?</b>	09:51	6	<b>Q. Sorry.</b>	09:54
7	A. He is a longtime friend of mine. He	09:51	7	A. -- difficult question. I think I	09:54
8	also used to be an activist, pro-democracy activist.	09:51	8	maintain a personal relationship with him and, also,	09:54
9	He's a friend with the late Nobel Peace Prize winner	09:51	9	politically, I support his effort and I also have a	09:55
10	Liu Xiaobo.	09:51	10	lot of reservation about him.	09:55
11	<b>Q. So why did Mr. Ho introduce you to Mr.</b>	09:51	11	<b>Q. What are those reservations?</b>	09:55
12	<b>Guo?</b>	09:51	12	A. He just brings troubles to me. You	09:55
13	MR. GRENDI: Objection, form.	09:51	13	know, I live a very simple straightforward life.	09:55
14	MR. GAVENMAN: Objection to form.	09:51	14	This is my first deposition, first -- you know, this,	09:55
15	THE WITNESS: I think, at the time, they were	09:52	15	it's not fun.	09:55
16	talking about the options, what to do, whether to	09:52	16	My focus is the big picture, how to change	09:55
17	seek political asylum or other form of protection,	09:52	17	China, how to promote democracy. I don't want to	09:55
18	and he knows that, you know, I'm familiar with the	09:52	18	sign on to derail from that goal. This definitely is	09:55
19	American legal system. So he brought me to discuss	09:52	19	troublesome to me.	09:55
20	those options with Miles.	09:52	20	<b>Q. Do you have any concern about whether</b>	09:55
21	BY MR. GREIM:	09:52	21	<b>Guo is fully committed to overturning the Chinese</b>	09:56
22	<b>Q. And is it fair to say that you assisted</b>	09:52	22	<b>communist system?</b>	09:56
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<p>1 A. Well, I think he's fully committed. At 09:56      2 the same time, he also has his relatives, his 09:56      3 employees to be considered and his assets, although, 09:56      4 all of it has been confiscated. So I understand his 09:56      5 position. 09:56</p> <p>6 <b>Q. And would it surprise you if Mr. Guo,</b> 09:56      7 <b>for example, vacillates in wanting regime change</b> 09:56      8 <b>versus something less than that?</b> 09:56</p> <p>9 MR. GRENDI: Object to the form. 09:57      10 MR. GAVENMAN: Object to the form. 09:57      11 THE WITNESS: Can you rephrase that? 09:57      12 BY MR. GREIM: 09:57</p> <p>13 <b>Q. Sure. Sure. Would it surprise you that</b> 09:57      14 <b>Mr. Guo tries to bargain with Chinese officials?</b> 09:57</p> <p>15 MR. GRENDI: Object to the form. 09:57      16 MR. GAVENMAN: Objection to form. 09:57      17 THE WITNESS: Frankly, I think it's possible, 09:57      18 but it's unlikely, highly unlikely. It's too late 09:57      19 for that. 09:57</p> <p>20 BY MR. GREIM: 09:57</p> <p>21 <b>Q. What do you mean by it's too late for</b> 09:57      22 <b>that?</b> 09:57</p>	<p>1 MR. GRENDI: Object to the form. 09:58      2 THE WITNESS: I didn't know. 09:58      3 BY MR. GREIM: 09:58</p> <p>4 <b>Q. Do you know whether he is negotiating</b> 09:58      5 <b>with Chinese officials even today?</b> 09:59</p> <p>6 A. I didn't know that either. 09:59      7 <b>Q. Let's shift gears for a moment here and</b> 09:59      8 <b>-- well, before we move on. After you met Guo, Mr.</b> 09:59      9 <b>Guo --</b> 09:59</p> <p>10 A. Yeah. 09:59</p> <p>11 <b>Q. -- did he introduce you to others</b> 09:59      12 <b>besides Yvette Wang over the next month or two?</b> 09:59</p> <p>13 A. I met all his families, family members, 09:59      14 through him. I met with Tony Blair. I met -- who 09:59      15 else? There were several other people that's 09:59      16 significant maybe. 09:59</p> <p>17 <b>Q. Did he introduce you to someone named</b> 10:00      18 <b>Hansheng Wang?</b> 10:00</p> <p>19 A. He never introduced me to Hansheng Wang. 10:00      20 Hansheng Wang, I know used to be his staff. I got to 10:00      21 know him in that capacity. 10:00</p> <p>22 <b>Q. What does Hansheng Wang do for Mr. Guo?</b> 10:00</p>
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<p>1 MR. GRENDI: Object to the form. 09:57      2 MR. GAVENMAN: Objection to form. 09:57      3 THE WITNESS: He's already put himself in the 09:57      4 position that he is the number one enemy of the 09:57      5 regime. 09:57</p> <p>6 BY MR. GREIM: 09:57</p> <p>7 <b>Q. When did he cross that line?</b> 09:57</p> <p>8 MR. GAVENMAN: Objection to form. 09:58      9 MR. GRENDI: Objection to the form. 09:58      10 THE WITNESS: I don't know for sure. My 09:58      11 speculation -- can I speculate? 09:58</p> <p>12 MR. GAVENMAN: You shouldn't speculate. Only 09:58      13 speak to things that you know. 09:58</p> <p>14 THE WITNESS: All right. But I think -- can 09:58      15 I just say, more likely, after he turned the MSS 09:58      16 Secretary of Discipline into FBI, they busted them at 09:58      17 La Guardia Airport and I think that's where he 09:58      18 crossed the line. 09:58</p> <p>19 BY MR. GREIM: 09:58</p> <p>20 <b>Q. Do you know whether he attempted to</b> 09:58      21 <b>negotiate with Chinese officials even after that</b> 09:58      22 <b>point?</b> 09:58</p>	<p>1 MR. GRENDI: Object to form. 10:00      2 MR. GAVENMAN: Objection to the form. 10:00      3 THE WITNESS: If I saw him, he do -- he does 10:00      4 lots of different things, bodyguard, security. He 10:00      5 also cooks. What else he does? Run errands, book 10:00      6 hotel rooms, you know. 10:00</p> <p>7 BY MR. GREIM: 10:00</p> <p>8 <b>Q. Does he run any companies?</b> 10:00      9 A. I have no knowledge. 10:00</p> <p>10 <b>Q. Do you know if he's a principal of</b> 10:00      11 <b>Eastern Profit?</b> 10:01</p> <p>12 A. I didn't know that. 10:01</p> <p>13 <b>Q. Does he actually live in Mr. Guo's</b> 10:01      14 <b>apartment?</b> 10:01</p> <p>15 A. I didn't know that either. 10:01</p> <p>16 MR. GAVENMAN: Objection to form. 10:01      17 MR. GRENDI: Object to the form. 10:01      18 THE WITNESS: I saw him all the time there, 10:01      19 but I didn't know he lived there. 10:01</p> <p>20 BY MR. GREIM: 10:01</p> <p>21 <b>Q. Which Guo family members were you</b> 10:01      22 <b>introduced to?</b> 10:01</p>

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<p>1 A. I met his son, Wu Chun. I met his 10:01      2 daughter, Wo Mei, his wife, Yu Chen Su. 10:01      3 <b>Q. We'll get some of these names here on 10:01</b>      4 <b>the break.</b> 10:01      5 A. Okay. 10:01      6 MR. GRENDI: Eddie, I'm just going to jump in 10:01      7 here. Are we going to get on topic here? We're 10:02      8 talking about -- 10:02      9 MR. GREIM: We are on topic. 10:02      10 MR. GRENDI: Talking about Mr. Guo's family 10:02      11 and who Mr. Lianchao has met, this has nothing to do 10:02      12 with this dispute. 10:02      13 MR. GREIM: Please don't disrupt the 10:02      14 deposition. 10:02      15 MR. GRENDI: I'm not disrupting the 10:02      16 deposition. I want to move it along and have it on 10:02      17 topic. You know, we're discussing irrelevant stuff 10:02      18 right now, but please continue. 10:02      19 BY MR. GREIM: 10:02      20 <b>Q. When was the first time that you met 10:02</b>      21 <b>French Wallop?</b> 10:02      22 A. Let's see. I would say September -- 10:02   </p>	<p>1 <b>Guo?</b> 10:04      2 MR. GRENDI: Object to the form. 10:04      3 THE WITNESS: I didn't approach them. 10:04      4 BY MR. GREIM: 10:04      5 <b>Q. Did Ms. Wallop approach you?</b> 10:04      6 A. No. That's not the case. They were 10:04      7 introduced through Bill Gertz. Bill Gertz called me 10:04      8 and said can you set up meeting with Miles; I want to 10:04      9 introduce Mike and French, Strategic Vision, to help 10:04      10 Miles. So I set up meeting and we were introduced 10:04      11 that way. 10:04      12 <b>Q. Okay. Did you already know Mr. Gertz?</b> 10:04      13 A. Yes. 10:04      14 <b>Q. How long have you known him?</b> 10:05      15 A. Thirty years. 10:05      16 <b>Q. Now, did Mr. Gertz, then, already seem 10:05</b>      17 <b>to know or already seem to have a specific project in 10:05</b>      18 <b>mind for Mr. Guo?</b> 10:05      19 MR. GRENDI: Objection. 10:05      20 MR. GAVENMAN: Object to the form. 10:05      21 THE WITNESS: Yes. 10:05      22 BY MR. GREIM: 10:05   </p>
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<p>1 October or September of 2017. 10:02      2 <b>Q. Did you know her beforehand?</b> 10:02      3 A. I didn't know her. I know her -- I 10:02      4 worked with her husband many years ago. So I had a 10:02      5 very good relationship with his office. Naturally, I 10:03      6 know of her. I didn't met her. 10:03      7 <b>Q. Was this Senator Malcolm Wallop?</b> 10:03      8 A. Correct. 10:03      9 <b>Q. What about Mr. Waller?</b> 10:03      10 A. That was the same time I met with 10:03      11 French. 10:03      12 <b>Q. Did she you know of Mr. Waller before 10:03</b>      13 <b>the fall of 2017?</b> 10:03      14 A. No. 10:03      15 <b>Q. Let's talk a little bit about the 10:03</b>      16 <b>research project that's at issue here. How is it 10:03</b>      17 <b>that -- well, let me ask you this: Did there come a 10:03</b>      18 <b>time that you approached French Wallop about possible 10:03</b>      19 <b>work for Mr. Guo?</b> 10:04      20 A. Say that again. 10:04      21 <b>Q. Did there come a time when you 10:04</b>      22 <b>approached Ms. Wallop about possible work for Mr. 10:04</b> </p>	<p>1 <b>Q. What was that?</b> 10:05      2 A. I think that was the original proposal 10:05      3 French and Mike brought with them or maybe they first 10:05      4 gave it to me and I shared it with Miles to handle 10:05      5 his communication, pretty much. 10:05      6 <b>Q. So when Mr. Gertz came to you --</b> 10:05      7 A. Yes. 10:05      8 <b>Q. -- and asked you to set up this 10:05</b>      9 <b>meeting --</b> 10:05      10 A. Yes. 10:05      11 <b>Q. -- did you understand that he had 10:05</b>      12 <b>already spoken to Ms. Wallop and Mr. Waller?</b> 10:05      13 A. Absolutely. 10:06      14 MR. GRENDI: Objection. 10:06      15 BY MR. GREIM: 10:06      16 <b>Q. At that time, let's say when -- let me 10:06</b>      17 <b>strike that.</b> 10:06      18 <b>When Mr. Gertz first contacted you about 10:06</b>      19 <b>this --</b> 10:06      20 A. Yeah. 10:06      21 <b>Q. -- were you already aware that Mr. Guo 10:06</b>      22 <b>was looking for some type of research?</b> 10:06   </p>
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<p>1 A. No. 10:06      2 MR. GAVENMAN: Objection to form. 10:06      3 MR. GRENDI: Objection to the form. 10:06      4 THE WITNESS: Miles didn't even know what he 10:06      5 was looking for. He had -- this is not his idea 10:06      6 whatsoever. 10:06      7 BY MR. GREIM: 10:06  <b>Q. Why did you agree to set up a meeting</b> 10:06  <b>between Wallop and Waller and Guo?</b> 10:07      10 A. I think French and Mike had very good 10:07      11 experience in handling strategic communication. They 10:07      12 have a good reputation in Washington, D.C., also 10:07      13 under the strong recommendation by Bill Gertz. I 10:07      14 also know Senator Wallop. So I, of course, I 10:07      15 naturally think they could do the job. 10:07  <b>Q. Before this project came along --</b> 10:07      17 A. Yeah. 10:07  <b>Q. -- had you ever been involved with any</b> 10:07  <b>sort of research project into individuals?</b> 10:07      20 MR. GAVENMAN: Objection to form. 10:08      21 THE WITNESS: No. 10:08      22 BY MR. GREIM: 10:08   </p>	<p>1 but there was a huge leak of data that exposed lots 10:09      2 of Chinese Government officials' offshore companies. 10:09      3 I looked into that. 10:09      4 We did a lot of research through different 10:09      5 means and we submitted it the U.S. Government about 10:10      6 those individuals, that corruption with a select few 10:10      7 that specifically -- you know, based on the 10:10      8 corruption and required the U.S. Government sanction 10:10      9 them under the FCP Act. 10:10  <b>Q. And -- okay. And was that with the</b> 10:10  <b>Hudson Institute?</b> 10:10      12 A. No. With the Citizen Power initiative 10:10      13 and with the Hudson initiative. 10:10  <b>Q. I see. So in the fall of 2017 -- and</b> 10:10  <b>then we'll take a break here.</b> 10:10      16 A. Yeah. 10:10  <b>Q. In the fall of 2017, had you discussed</b> 10:10  <b>with Mr. Guo that he might be able to contribute to</b> 10:10  <b>something like that, to that kind of an effort?</b> 10:11      20 A. Yes, I did. 10:11  <b>Q. And was that before Mr. Gertz contacted</b> 10:11  <b>you about Ms. Wallop and Mr. Waller?</b> 10:11   </p>
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<p>1 <b>Q. Had you ever been involved with any sort</b> 10:08      2 <b>of research project into the Chinese Communist Party?</b> 10:08      3 MR. GAVENMAN: Objection to form. 10:08      4 THE WITNESS: Just personally on my -- what 10:08      5 type of research? Can you rephrase that? 10:08      6 BY MR. GREIM: 10:08  <b>Q. Sure. Maybe a project where there would</b> 10:08  <b>be an effort to find nonpublic information about</b> 10:08  <b>Chinese Communist Party members.</b> 10:08      10 MR. GAVENMAN: Objection to form. 10:08      11 THE WITNESS: Not in -- we have done lots of 10:08      12 -- I've done lots of research on the Communist Party 10:08      13 members, particularly on the corruption side. I 10:08      14 worked with Hudson Institute. This Kleptocracy 10:08      15 Center, I helped them with the relationship, the 10:09      16 mapping of Chinese high-ranking government officials, 10:09      17 their corruption, you know, potential corruption. 10:09      18 I also worked on several other projects, 10:09      19 tried to pinpoint the Chinese high-ranking government 10:09      20 officials, the family corruption, and based on some 10:09      21 of the -- based on the international consortium, you 10:09      22 know, there was a leak from Wikipedia for the source, 10:09   </p>	<p>1 A. Yes. 10:11  <b>Q. So do you know whether Mr. Guo was at</b> 10:11  <b>least considering some sort of research project into</b> 10:11  <b>the Chinese Communist Party members?</b> 10:11      5 A. It's not -- 10:11      6 MR. GAVENMAN: Objection to form. 10:11      7 MR. GRENDI: Objection to the form. 10:11      8 THE WITNESS: Yeah. It's not specific. This 10:11      9 idea, my point at the time when I communicated with 10:11      10 Miles, I said in order to have this whistle-blowing, 10:11      11 this disruptive momentum you made to continue -- they 10:11      12 call it the whistle-blowing revolution to continue -- 10:11      13 I told him you need very solid evidence to 10:11      14 sustainable expose Chinese communist high-ranking 10:11      15 government officials. 10:12      16 So that was the principle. We never get into 10:12      17 detail how to do it until Mike and French's proposal 10:12      18 come over. I was the one -- originally, this project 10:12      19 basically is a communication, handling the 10:12      20 communication, P.R., not into the investigation. I 10:12      21 was the one who approached -- I explored this 10:12      22 possibility with French and Mike first and they said 10:12   </p>

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<p>1 they can do it and then I convinced Miles to move to 10:12      2 this direction. It's not from Miles. It's from me. 10:12      3 MR. GREIM: Okay. I don't know that we've 10:12      4 been going for quite an hour yet, but let's go ahead 10:12      5 and take our first break, if that's okay. 10:13      6 THE WITNESS: All right. 10:13      7 MR. GREIM: We'll take a -- let's go ahead 10:13      8 and try to just make it five, if we can. 10:13      9 VIDEOGRAPHER: Going off the record. The 10:13      10 time is 10:15 a.m. 10:13      11 [Recess.] 10:26      12 VIDEOGRAPHER: We are back on the record. 10:26      13 The time is now 10:28 a.m. 10:26      14 BY MR. GREIM: 10:26      15 Q. Welcome back, Mr. Han. 10:26      16 A. Yes. 10:26      17 Q. Let's go again to the same timeframe 10:26      18 we've been talking about, sort of late summer, early 10:26      19 fall of 2017. At that time, is it fair to say that 10:26      20 your interactions with Mr. Guo were, number one, 10:26      21 about his asylum application -- 10:26      22 A. Correct. 10:26   </p>	<p>1 THE WITNESS: You mean through social media? 10:27      2 BY MR. GREIM: 10:27      3 Q. Through social media. 10:27      4 A. Yes. 10:27      5 Q. So you reviewed some of those items 10:27      6 yourself? 10:27      7 A. Usually, you know, his media videos are 10:27      8 too long. I usually don't watch it unless there's a 10:28      9 specific issue I found interesting. 10:28      10 Q. Now, did you talk with Mr. Guo about his 10:28      11 own background? 10:28      12 And this is -- we're going to limit it to, you 10:28      13 know, all your discussions with him up until the time 10:28      14 you introduced Strategic Vision to Mr. Guo. 10:28      15 MR. GRENDI: Object to the form. 10:28      16 MR. GAVENMAN: Object to form. 10:28      17 THE WITNESS: There are some discussions, 10:28      18 because I think that's also privileged because of 10:28      19 related to his political asylum. I think it's better 10:28      20 not for me to talk about it. 10:28      21 BY MR. GREIM: 10:28      22 Q. Did he retain you as counsel on the 10:28   </p>
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<p>1 Q. -- and, number two, some general 10:26      2 discussions about what it would take for him to sort 10:26      3 of be a whistleblower about the Chinese Communist 10:26      4 Party? 10:26      5 MR. GAVENMAN: Objection. 10:26      6 MR. GRENDI: Object to the form. 10:26      7 THE WITNESS: He was already a whistleblower 10:26      8 at the time. My suggestion was to sustain that 10:27      9 whistleblower. 10:27      10 BY MR. GREIM: 10:27      11 Q. Now, by this point, had you done any 10:27      12 research of your own into Mr. Guo's background? 10:27      13 A. A little bit. 10:27      14 Q. Okay. What did you do to look into his 10:27      15 background? 10:27      16 A. Just online information. 10:27      17 Q. So you read some of the articles that 10:27      18 had been written about him? 10:27      19 A. Correct. 10:27      20 Q. And by this point, had he begun posting 10:27      21 things online himself? 10:27      22 MR. GRENDI: Object to the form. 10:27   </p>	<p>1 political asylum matter? 10:29      2 A. Not as counsel, but as facilitator, you 10:29      3 know, sort of a legal assistant. We -- yeah. 10:29      4 Q. Okay. So I want to make sure I'm clear. 10:29      5 Do you believe you were acting as his attorney? 10:29      6 A. I wasn't -- 10:29      7 MR. GRENDI: Object to form. 10:29      8 MR. GAVENMAN: Object to the form. 10:29      9 [Interruption.] 10:29      10 BY MR. GREIM: 10:29      11 Q. Were you able to finish your answer? 10:29      12 A. Yes. 10:29      13 Q. Were you being paid by Guo at this time? 10:29      14 A. No. 10:29      15 MR. GRENDI: Object to the form. 10:29      16 BY MR. GREIM: 10:29      17 Q. By the way, have you ever been paid by 10:29      18 Mr. Guo or by one of the entities he controls? 10:29      19 A. No. 10:30      20 MR. GRENDI: Objection. 10:30      21 MR. GAVENMAN: Objection to form. 10:30      22 BY MR. GREIM: 10:30   </p>
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1	<b>Q. Have you been paid by the Rule of Law Foundation?</b>	10:30	1	MR. GAVENMAN: Objection to form.	10:32
2	A. No.	10:30	2	MR. GRENDI: Objection.	10:32
3	<b>Q. Okay. Then here's what I'll do. I'm not -- I don't believe a privilege will apply to shield his disclosures to you about his past from discovery, but what I'm going to do is just simply ask you about your knowledge. Okay?</b>	10:30	3	THE WITNESS: A lot of that discussion, you know, this is all from the meeting.	10:32
4	<b>And what we'll try to do is not put it -- we will try not to ask about conversations that you had with him while his asylum counsel were present. Okay?</b>	10:30	4	MR. GAVENMAN: So I'm going to instruct you not to answer, attorney-client privilege.	10:32
5		10:30	5	THE WITNESS: Yeah.	10:32
6		10:30	6	BY MR. GREIM:	10:32
7		10:30	7	<b>Q. Did Mr. Guo make representations to French Wallop or Mike Waller about his past?</b>	10:32
8		10:30	8	MR. GAVENMAN: Objection to form, foundation.	10:33
9		10:30	9	THE WITNESS: During the meeting with them?	10:33
10		10:30	10	BY MR. GREIM:	10:33
11		10:30	11	<b>Q. Yes.</b>	10:33
12		10:30	12	A. I didn't remember exactly what he said to them. I think that maybe there is some discussion.	10:33
13	A. [Gestures.]	10:30	13	THE WITNESS: Correct.	10:33
14	<b>Q. Okay.</b>	10:30	14	BY MR. GREIM:	10:33
15	MR. GAVENMAN: Let me caution you. To the extent you learned anything in the course of those discussions, you shouldn't disclose that either.	10:30	15	<b>Q. Did Mr. Guo participate in the Tieneman Square protest?</b>	10:33
16		10:31	16	A. During the time of that meeting?	10:33
17		10:31	17	MR. GAVENMAN: Asked and answered.	10:33
18	THE WITNESS: Correct.	10:31	18	MR. GRENDI: Objection.	10:33
19	BY MR. GREIM:	10:31			
20	<b>Q. So did you understand that Mr. Guo became a dissident during the Tieneman Square demonstrations and massacre?</b>	10:31			
21		10:31			
22		10:31			
		Page 50			Page 52
1	A. Say that again.	10:31	1	MR. GAVENMAN: We've established that there is privilege attached to that answer. So I instruct you not to answer as well.	10:33
2	<b>Q. Well, let me ask you a different question, because that's -- did you understand that Mr. Guo participated in the Tieneman Square demonstrations and massacre?</b>	10:31	2	BY MR. GREIM:	10:33
3		10:31	3	<b>Q. What do you remember about what Mr. Guo said about himself to Ms. Wallop and Mr. Waller?</b>	10:33
4		10:31	4	A. I don't remember much.	10:34
5		10:31	5	<b>Q. What do you remember though?</b>	10:34
6	MR. GRENDI: Object to the form.	10:31	6	A. I remember specifically what was discussed about the proposal, you know, what to do about what information is required and the back and forth.	10:34
7	MR. GAVENMAN: Objection.	10:31	7	THE WITNESS: He wanted to expose the corruption of the highest-ranking members of the Communist Party.	10:34
8	THE WITNESS: Understand?	10:31	8	BY MR. GREIM:	10:34
9	BY MR. GREIM:	10:31	9	<b>Q. Did he say how he wanted to do that?</b>	10:34
10	<b>Q. Yes. Did you believe?</b>	10:31	10	MR. GAVENMAN: Objection.	10:34
11	MR. GRENDI: Objection.	10:31	11	MR. GRENDI: Objection to form.	10:34
12	MR. GAVENMAN: Objection. This is pretty far afield from what Mr. Han is here to testify about.	10:31	12	THE WITNESS: He wanted to expose the corruption of the highest-ranking members of the Communist Party.	10:34
13	I'm not sure how this is a good use of your time, but you can keep going.	10:31	13	BY MR. GREIM:	10:34
14		10:32	14	<b>Q. Did he say how he wanted to do that?</b>	10:34
15		10:32	15	MR. GAVENMAN: Objection.	10:34
16	THE WITNESS: That discussion is with his counsel.	10:32	16	MR. GRENDI: Objection to form.	10:34
17		10:32	17	THE WITNESS: He wanted to expose the corruption of the highest-ranking members of the Communist Party.	10:34
18	MR. GAVENMAN: So objection, privilege. I instruct you not to answer.	10:32	18	BY MR. GREIM:	10:34
19		10:32	19	<b>Q. Did he say how he wanted to do that?</b>	10:34
20	THE WITNESS: Right.	10:32	20	MR. GAVENMAN: Objection.	10:34
21	BY MR. GREIM:	10:32	21	THE WITNESS: He wanted to expose the corruption of the highest-ranking members of the Communist Party.	10:34
22	<b>Q. Do you know why Mr. Guo left China?</b>	10:32	22	BY MR. GREIM:	10:34

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<p>1 A. That was during the discussion. How 10:34      2 he's going to do it, I don't think he has an idea. 10:35      3 We proposed -- I actually talked to French and Mike, 10:35      4 seeing whether we can use some unconventional way to 10:35      5 obtain this information. 10:35  <b>Q. Do you know, roughly, when Mr. Guo began 10:35</b>  <b>speaking out against Communist Part members? 10:36</b>      8 MR. GAVENMAN: Objection the form. 10:36      9 THE WITNESS: I would say in the America, at 10:36      10 least, I know, maybe April of 2017. This is during 10:36      11 his interview with Mirror Tv. 10:36      12 BY MR. GREIM: 10:36  <b>Q. What the Mirror Tv? 10:36</b>      14 A. It's a Chinese language TV, maybe the 10:36      15 largest Chinese language media group here, based in 10:36      16 New York. 10:36  <b>Q. Have you seen that interview? 10:36</b>      18 A. I didn't. 10:36  <b>Q. Have you seen -- 10:36</b>      20 A. Maybe just very part. 10:37  <b>Q. I'm sorry? You may have just seen part 10:37</b>      22 of it? 10:37   </p>	<p>1 A. Let's make it clear. 10:38      2 <b>Q. That's right. So Mr. Gertz is the one 10:38</b>  <b>who introduced Wallop and Waller to you and then you 10:38</b>  <b>met with Wallop and Waller after that? 10:38</b>      5 A. He is introducing them to Miles. I am 10:39      6 the facilitator to set it up. 10:39  <b>Q. Okay. I'm going to direct you to -- 10:39</b>      8 <b>and, first of all, this article is based on Mr. 10:39</b>  <b>Gertz's interview of Mr. Guo. I want to direct you 10:39</b>      10 <b>first to -- before we do this, let me ask you are you 10:39</b>      11 <b>aware of an alleged Chinese origin cyber attack on 10:39</b>      12 <b>the Hudson Institute? 10:39</b>      13 A. Yes. 10:39  <b>Q. And you recall that Guo has frequently 10:39</b>      15 cited that as evidence that the Chinese Government is 10:39      16 out to get him, basically? 10:39      17 MR. GRENDI: Objection to form. 10:39      18 MR. GAVENMAN: Objection to the form. 10:39      19 THE WITNESS: I didn't know. 10:40      20 BY MR. GREIM: 10:40  <b>Q. Okay. Were you helping to plan the 10:40</b>      22 Hudson event? 10:40   </p>
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<p>1 A. Maybe a small part of it, not directly 10:37      2 from Tv. They always, you know, like through You 10:37      3 Tube, somebody else posted it. 10:37  <b>Q. Right. Have you seen other interviews 10:37</b>      5 of Mr. Guo on You Tube or on TV? 10:37      6 A. I might, but very limited. 10:37  <b>Q. Do you remember what articles you 10:37</b>      8 reviewed about Mr. Guo's past? 10:37      9 A. I didn't. 10:37      10 [Han Exhibit No. 2 was 10:38      11 marked for identification.] 10:38      12 BY MR. GREIM: 10:38  <b>Q. I'm going to show you what we are 10:38</b>      14 marking as Exhibit 2. You'll see this is an article 10:38      15 by Bill Gertz, who we mentioned a few times earlier 10:38      16 today. It appeared October 9, 2017. 10:38  <b>Is this around the time, by the way, that you 10:38</b>      18 were introducing Ms. Wallop and Mr. Waller to Mr. 10:38      19 Guo? 10:38      20 A. I think this is before the time that he 10:38      21 was introducing. 10:38  <b>Q. That's right. 10:38</b> </p>	<p>1 A. Correct. 10:40      2 MR. GRENDI: Objection. 10:40      3 BY MR. GREIM: 10:40  <b>Q. Are you aware that the Hudson event -- 10:40</b>      5 well, who was in charge of the HUD event within the 10:40      6 institute? 10:40      7 A. It was Charles Davidson at the 10:40      8 beginning. 10:40  <b>Q. What was the last name? 10:40</b>      10 A. Davidson, and then I took it over, 10:40      11 because he said he's not able to do it. He's afraid 10:40      12 that, you know, his son-in-law's -- his son's fiance, 10:40      13 who is Chinese, will be retaliated against. So he 10:40      14 asked me to take over. 10:40  <b>Q. Who is the person at Hudson who agreed 10:40</b>      16 to cancel the event? 10:40      17 A. I think the -- 10:40      18 MR. GRENDI: Objection to the form. 10:40      19 MR. GAVENMAN: Objection. 10:40      20 THE WITNESS: I think the head of -- the CEO, 10:40      21 Ken Winston. I don't know exactly who agreed, but it 10:41      22 was Ken called me to tell me it's cancelled. 10:41   </p>
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1 THE WITNESS: In the private meeting, he told 2 me that he's -- he expressed a very completely 3 different view about Xi, about Communist Party. 4 BY MR. GREIM: 5 Q. What do you mean, a completely different 6 view? 7 A. He's opposing Xi's dictatorship -- put 8 it that way -- strongly. 9 Q. Sir, I'm going to play for you a video 10 of Mr. Guo speaking. I'm going to see if this is 11 something you have heard before and I'm going to see 12 if you at least recognize his voice. 13 A. Yeah. 14 Q. This will be in Chinese. So the court 15 reporter will not be able to transcribe it. 16 A. Okay. 17 Q. However, I'm going to distribute a 18 translation that we have already served on our 19 opposing counsel and I'll make it available to you as 20 well. We are going to mark this as Han 3. 21 [Han Exhibit No. 3 was 22 marked for identification.]	10:58 10:58 10:58 10:58 10:58 10:58 10:58 10:58 10:59 10:59 10:59 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:01	1 [Video presentation.] 2 MR. GREIM: All right. That's the end of the 3 clip. 4 MR. GRENDI: I'm sorry. Objection. I just 5 don't understand. Are there two speakers on that or 6 just one? 7 MR. GREIM: This was -- let me read some more 8 background on this. This was pulled from You Tube, 9 https://youtu.be/whKwuLpKbUQ published April 29, 10 2017. 11 Let me ask the witness, first of all -- 12 MR. GRENDI: Hold on. 13 BY MR. GREIM: 14 Q. Do you recognize the voice on the recording? 15 MR. GRENDI: Objection. Are there two voices? I don't understand. It says Speaker 1. 16 MR. GREIM: Please don't interrupt the questioning. There's only one thing that says Speaker 1. There are not two voices. 17 MR. GRENDI: I don't know. 18 MR. GREIM: Please don't interrupt. Please	11:02 11:05
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1 MR. GREIM: I'm going to arrange these 2 speakers so that, hopefully, everybody can hear this 3 really well. 4 MR. GRENDI: Is this a certified translation? 5 MR. GREIM: Yeah. The affidavit that you 6 received goes with all of these. This has been 7 produced to you. 8 MR. GRENDI: I got a lot of stuff in the last 9 few days. 10 All right. On your representation this is 11 certified translation, I would object to the extent 12 it's not certified. 13 MR. GREIM: Okay. 14 MR. GRENDI: Thank you. 15 MR. GREIM: All right. And here we go. This 16 is about a three-minute-and-one-second clip. 17 Actually, the You Tube version of this, sir, has -- I 18 know someone from You Tube tried to translate it, and 19 just so you can see what I'm playing, I'm going to 20 turn my computer screen around so that you can see 21 it. I know it's some distance from you, but I'm 22 going to ahead and play.	11:01 11:02 11:02 11:02	1 don't interrupt the questioning. 2 MR. GRENDI: Objection to the entire line of 3 questioning. You may continue. 4 MR. GAVENMAN: I object as well. 5 BY MR. GREIM: 6 Q. All right. Do you recognize the voice on the recording, sir? 7 A. Yes. 8 Q. Whose voice is that? 9 A. Miles. 10 Q. I'm sorry? 11 A. Miles. 12 Q. Miles? 13 A. Yes. 14 Q. Have you heard any part of this before? 15 A. No. This is actually my first time. 16 Q. And did you hear in the opening that Mr. Guo said I have absolute faith in General Secretary Xi? 17 MR. GREIM: Objection. 18 THE WITNESS: Yes. 19 BY MR. GREIM:	11:06 11:06
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<p>1     <b>there, because everybody -- most people at this</b> 11:09      2     <b>table, I think, have the same goals and there are --</b> 11:09      3     <b>we probably do not need to get into the answer to</b> 11:09      4     <b>that question.</b> 11:09      5       <b>Okay. There's just no need to do that here.</b> 11:09      6       A. Okay. 11:09      7       MR. GRENDI: Wait. Stop. 11:09      8       MR. PODHASKIE: It's one of his best friends 11:09      9       on Twitter. Let him go on and explain. 11:09      10      MR. GRENDI: Hold on, Dan. You don't have an 11:09      11       appearance here. 11:09      12      MR. GREIM: I would ask Mr. Podhaskie to 11:09      13       please stop interfering with the deposition. 11:09      14      MR. GAVENMAN: As Mr. Han's counsel, he has 11:09      15       to be allowed to answer the question completely. You 11:09      16       asked a question. He can answer. 11:10      17      MR. GREIM: Fair enough. Fair enough. I 11:10      18       detected some hesitance and I wanted to signal to the 11:10      19       witness that we didn't need to hear it, but if you 11:10      20       would like to finish the answer, go ahead. 11:10      21      MR. GAVENMAN: Please complete your answer, 11:10      22      Mr. Han. 11:10</p>	<p>1       suing others. It's the other side suing him as well. 11:11      2       BY MR. GREIM: 11:11      3           <b>Q. Is it your testimony that every</b> 11:11      4           <b>dissident that Mr. Guo is in litigation with -- well,</b> 11:11      5           <b>let me back up. That's a closed question.</b> 11:11      6           <b>Let me just ask you this.</b> 11:11      7       A. Yeah. 11:12      8           <b>Q. Are you aware of whether Mr. Guo is in</b> 11:12      9           <b>litigation with any dissident who is not working with</b> 11:12      10          <b>the Chinese regime?</b> 11:12      11       MR. GAVENMAN: Objection to form. 11:12      12       MR. GRENDI: Objection to form. 11:12      13       THE WITNESS: I'm not sure. I think there 11:12      14       are lots of them working with the regime, because 11:12      15       they, themselves, cannot afford this large amount 11:12      16       legal bill. Nobody wants to pay that. 11:12      17       BY MR. GREIM: 11:12      18           <b>Q. As you said earlier, could some of these</b> 11:12      19           <b>dissidents be trying in their own way to use the</b> 11:12      20           <b>regime?</b> 11:12      21       MR. GAVENMAN: Objection, form. 11:12      22       MR. GRENDI: Objection to form. 11:12</p>
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<p>1       THE WITNESS: Yes. We have evidence that Xi 11:10      2       Nuo is working with the Chinese regime. I have 11:10      3       submitted that evidence to the FBI. 11:10      4       BY MR. GREIM: 11:10      5           <b>Q. By the way, was there anything that you</b> 11:10      6       <b>heard in the clip that was audible to you or that</b> 11:10      7       <b>you did not understand?</b> 11:10      8       A. No. 11:10      9           <b>Q. Are you aware that Mr. Guo has filed</b> 11:10      10       <b>several lawsuits against dissidents in the United</b> 11:11      11       <b>States?</b> 11:11      12      MR. GAVENMAN: Objection to form. 11:11      13      MR. GRENDI: Objection to form. 11:11      14      THE WITNESS: Yes. 11:11      15      BY MR. GREIM: 11:11      16           <b>Q. And have you advised Mr. Guo on those</b> 11:11      17       <b>lawsuits?</b> 11:11      18      MR. GAVENMAN: Objection to form. 11:11      19      THE WITNESS: No, but I did ask him not to 11:11      20       get involved, because my reason is this is Chinese 11:11      21       Communist regime strategy, to get him involved in the 11:11      22       lawsuit, consume his resources. It's not just him 11:11</p>	<p>1       MR. GAVENMAN: Foundation. 11:12      2       THE WITNESS: Yes. 11:12      3       BY MR. GREIM: 11:12      4           <b>Q. Earlier, we talked a little bit about</b> 11:12      5           <b>the visit by Chinese authorities to Mr. Guo in the</b> 11:13      6           <b>United States.</b> 11:13      7       A. Yeah. 11:13      8           <b>Q. Do you recall when that occurred?</b> 11:13      9       A. I didn't. 11:13      10       <b>Q. Does May 2017 sound correct to you?</b> 11:13      11       A. Yes. 11:13      12       MR. GAVENMAN: Objection to form. 11:13      13       MR. GRENDI: Objection to form. 11:13      14       BY MR. GREIM: 11:13      15           <b>Q. Is that one of the -- did part of your</b> 11:13      16       <b>research into Mr. Guo involve reading accounts of the</b> 11:13      17       <b>visit by Chinese officials to Guo's apartment?</b> 11:13      18       MR. GRENDI: Objection. 11:14      19       THE WITNESS: Yes. 11:14      20       BY MR. GREIM: 11:14      21           <b>Q. And did Guo also discuss the visit with</b> 11:14      22       <b>you?</b> 11:14</p>
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<p>1 A. That was with the counsel. 11:14</p> <p>2 <b>Q. With counsel?</b> 11:14</p> <p>3 A. Yes. 11:14</p> <p>4 <b>Q. Okay. By the way, just to -- I want to</b> 11:14</p> <p>5 <b>be clear about this. Who were the names of the Clark</b> 11:14</p> <p>6 <b>Hill attorneys who were involved in that matter? Do</b> 11:14</p> <p>7 <b>you remember?</b> 11:14</p> <p>8 MR. GRENDI: Objection. 11:14</p> <p>9 THE WITNESS: Thomas Ragland. 11:14</p> <p>10 BY MR. GREIM: 11:14</p> <p>11 <b>Q. Okay.</b> 11:14</p> <p>12 A. It's public information, by the way. 11:14</p> <p>13 <b>Q. Jay Johnson, was he one of them?</b> 11:14</p> <p>14 A. Never heard of him. 11:14</p> <p>15 <b>Q. Are you aware that Mr. Guo recorded all</b> 11:14</p> <p>16 <b>or large portions of those meetings?</b> 11:15</p> <p>17 MR. GAVENMAN: Objection -- 11:15</p> <p>18 MR. GRENDI: Objection. 11:15</p> <p>19 MR. GAVENMAN: -- to form. You're talking 11:15</p> <p>20 about a privileged conversation? 11:15</p> <p>21 MR. GREIM: No. I'm sorry. Let me -- not 11:15</p> <p>22 meetings with Clark Hill. 11:15</p>	<p>1 MR. GREIM: Sure, but whether Mr. Guo has 11:15</p> <p>2 recordings of these meetings is not a privileged 11:15</p> <p>3 matter. Is it a fact. It either happened or it did 11:16</p> <p>4 not. 11:16</p> <p>5 THE WITNESS: I didn't know that. 11:16</p> <p>6 MR. GAVENMAN: Please don't reveal anything 11:16</p> <p>7 that you learned in a privileged conversation. 11:16</p> <p>8 THE WITNESS: Yeah. I didn't know whatever 11:16</p> <p>9 public information, but all I know is what I learned 11:16</p> <p>10 from the counsel regarding the meetings. 11:16</p> <p>11 [Han Exhibit No. 4 was 11:16</p> <p>12 marked for identification.] 11:16</p> <p>13 BY MR. GREIM: 11:16</p> <p>14 <b>Q. I'm going to show you what we're marking</b> 11:16</p> <p>15 <b>as Exhibit 4, and you'll see this is a "Wall Street</b> 11:16</p> <p>16 <b>Journal" article from October 22, 2017 and it goes on</b> 11:17</p> <p>17 <b>for about six pages.</b> 11:17</p> <p>18 A. Right. 11:17</p> <p>19 <b>Q. But you'll see that the main topic here</b> 11:17</p> <p>20 <b>is about the visit of the Chinese officials to Mr.</b> 11:17</p> <p>21 <b>Guo.</b> 11:17</p> <p>22 A. Right. 11:17</p>
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<p>1 MR. GAVENMAN: Okay. 11:15</p> <p>2 BY MR. GREIM: 11:15</p> <p>3 <b>Q. Are you aware that Mr. Guo recorded all</b> 11:15</p> <p>4 <b>or portions of his meetings with Chinese officials?</b> 11:15</p> <p>5 MR. GAVENMAN: Objection. 11:15</p> <p>6 MR. GRENDI: Objection to form, relevance. 11:15</p> <p>7 THE WITNESS: With the counsel. That was 11:15</p> <p>8 also with counsel. 11:15</p> <p>9 BY MR. GREIM: 11:15</p> <p>10 <b>Q. I'm sorry. I could not actually hear</b> 11:15</p> <p>11 <b>your answer over the objections. You're saying, yes,</b> 11:15</p> <p>12 <b>he recorded meetings with counsel?</b> 11:15</p> <p>13 <b>MR. GAVENMAN: No.</b> 11:15</p> <p>14 THE WITNESS: No. I said that's information 11:15</p> <p>15 -- 11:15</p> <p>16 MR. GAVENMAN: Mr. Han. Mr. Han. 11:15</p> <p>17 So what he's saying is, again, there was 11:15</p> <p>18 conversations with counsel present that were 11:15</p> <p>19 privileged conversations where he discussed this 11:15</p> <p>20 material. So he cannot get into that area. That's 11:15</p> <p>21 what he's saying. 11:15</p> <p>22 Please do not answer. 11:15</p>	<p>1 <b>Q. Correct?</b> 11:17</p> <p>2 A. Um-hum. 11:17</p> <p>3 <b>Q. And is that a picture of Mr. Guo at the</b> 11:17</p> <p>4 <b>top there?</b> 11:17</p> <p>5 A. Yes. 11:17</p> <p>6 <b>Q. Is that taken in his Sherry Netherland</b> 11:17</p> <p>7 <b>apartment?</b> 11:17</p> <p>8 MR. GRENDI: Objection. 11:17</p> <p>9 THE WITNESS: It looks like it. 11:17</p> <p>10 BY MR. GREIM: 11:17</p> <p>11 <b>Q. All right. Do you see in the third</b> 11:17</p> <p>12 <b>paragraph, it says: "Liu Yanping, the lead official,</b> 11:17</p> <p>13 <b>said he had come on behalf of Beijing 'to find a</b> 11:17</p> <p>14 <b>solution', according to Mr. Guo and a partial audio</b> 11:18</p> <p>15 <b>recording Mr. Guo said he made of the May encounter</b> 11:18</p> <p>16 <b>and posted online in September."</b> 11:18</p> <p>17 <b>Do you see that?</b> 11:18</p> <p>18 A. Um-hum. 11:18</p> <p>19 <b>Q. Now let me ask you -- I don't want to</b> 11:18</p> <p>20 <b>know -- well, unfortunately, you've got this</b> 11:18</p> <p>21 <b>continuing instruction and if you heard it from</b> 11:18</p> <p>22 <b>counsel, you can't even state the facts. I'm going</b> 11:18</p>
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1	<b>to ask you whether you recall reading articles like</b>	11:18	1	THE WITNESS: That is with the counsel in the	11:20
2	<b>this about Mr. Guo's recording of the May encounter.</b>	11:18	2	meeting.	11:20
3	MR. GRENDI: Objection.	11:18	3	MR. GREIM: Wait a minute. Wait, wait, wait.	11:20
4	THE WITNESS: This is the first time I read	11:18	4	Now, whether he's listened to it is not	11:20
5	this article.	11:18	5	privileged information. I'm not going to ask him the	11:20
6	BY MR. GREIM:	11:18	6	content of it, but it's a yes or no question -- yes	11:21
7	<b>Q. Okay. Well, when you first met Mr. Guo,</b>	11:18	7	or no answer whether he has listened to it. I don't	11:21
8	<b>I suppose this had already happened, hadn't it?</b>	11:18	8	want to know anything else about the circumstance.	11:21
9	<b>Because you said you met him for the first time in</b>	11:19	9	MR. GAVENMAN: I'm also very concerned here	11:21
10	<b>July or August?</b>	11:19	10	about attorney work product privilege and what's	11:21
11	A. Correct.	11:19	11	happening in that case. I mean, it's not just the	11:21
12	MR. GRENDI: Objection.	11:19	12	facts. It's not just what communications. There's	11:21
13	BY MR. GREIM:	11:19	13	attorney work product that's happening here, clearly,	11:21
14	<b>Q. By the way, have you met Steven Bannon</b>	11:19	14	and you need to stay away from it.	11:21
15	<b>before?</b>	11:19	15	You need to stay away. I don't know why	11:21
16	MR. GRENDI: Objection. What does that have	11:19	16	you're bothering to go in there anyway, recordings,	11:21
17	to do with this case, Counsel? I'm sorry, but Steve	11:19	17	not recordings. I mean, we don't need to be invading	11:21
18	Bannon, where does he come in? I just don't get it.	11:19	18	this privilege to get to the facts of this case.	11:21
19	MR. GREIM: Read the counterclaim.	11:19	19	I mean, we're going to have a long day here	11:21
20	MR. GRENDI: I have. You put in stuff about	11:19	20	if we're doing this and let's stay away from	11:21
21	Steve Bannon that has nothing to do with the case.	11:19	21	privileged information and get to the parts that	11:21
22	MR. GREIM: Please don't use up our time on	11:19	22	matter, please.	11:21
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1	the record.	11:19	1	MR. GREIM: Well, we disagree to your claims	11:21
2	Go ahead.	11:19	2	of privilege. We're just trying to work around them	11:21
3	THE WITNESS: Before this?	11:19	3	so that we can get through.	11:21
4	BY MR. GREIM:	11:19	4	BY MR. GREIM:	11:21
5	<b>Q. Yes.</b>	11:19	5	<b>Q. Did you -- let me -- okay. Let's go a</b>	11:21
6	A. Before what?	11:19	6	<b>little further.</b>	11:22
7	<b>Q. Well, let's say when did you -- have you</b>	11:19	7	<b>Why did you say that this incident of Mr. Guo</b>	11:22
8	<b>worked with Mr. Bannon in connection with Mr. Guo?</b>	11:19	8	<b>meeting with the Chinese officials may have been a</b>	11:22
9	MR. GAVENMAN: Objection to form.	11:19	9	<b>turning point for Mr. Guo?</b>	11:22
10	MR. GRENDI: Objection.	11:19	10	MR. GRENDI: Objection.	11:22
11	THE WITNESS: Bannon was introduced to him on	11:19	11	MR. GAVENMAN: Objection.	11:22
12	October, early October of 2017.	11:19	12	THE WITNESS: I think because they were	11:22
13	BY MR. GREIM:	11:19	13	arrested, detained by the FBI. I think the Chinese	11:22
14	<b>Q. By you?</b>	11:19	14	official may have believed that Miles sold them out	11:22
15	A. By Bill Gertz, not me.	11:19	15	and that he's working with American Government,	11:23
16	<b>Q. Now, how do you know that?</b>	11:20	16	busted them, take away their cellphones, computers.	11:23
17	A. Because I was with them.	11:20	17	Yeah.	11:23
18	<b>Q. Okay. Have you ever listened to a</b>	11:20	18	BY MR. GREIM:	11:23
19	<b>recording of Mr. Guo's meeting with Chinese</b>	11:20	19	<b>Q. All right. So that's -- I understand</b>	11:23
20	<b>officials?</b>	11:20	20	<b>that's what you think the Chinese officials may</b>	11:23
21	MR. GRENDI: Objection.	11:20	21	<b>believe.</b>	11:23
22	MR. GAVENMAN: Objection.	11:20	22	A. Right.	11:23
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<p>1       <b>Q. Now my next question is how do you know</b> 11:23      2     <b>-- what makes you believe that? What facts do you</b> 11:23      3     <b>have that form the basis for that belief?</b> 11:23      4       MR. GAVENMAN: Objection to form. 11:23      5       MR. GRENDI: Objection. 11:23      6       THE WITNESS: I think since then, there was a 11:23      7     -- as far as I can tell, the Chinese never sent 11:23      8     another team to communicate with Miles, just on my 11:23      9     knowledge, based on my best knowledge. 11:23      10      BY MR. GREIM: 11:24      11       <b>Q. Since then, has Guo sent anyone to China</b> 11:24      12     <b>to communicate with Chinese officials?</b> 11:24      13       A. I don't know. 11:24      14       MR. GRENDI: Objection. 11:24      15       MR. GAVENMAN: Objection to form. 11:24      16       THE WITNESS: I have no knowledge. 11:24      17      BY MR. GREIM: 11:24      18       <b>Q. Do you know whether Guo sent Steve</b> 11:24      19     <b>Bannon to communicate with Wang Qishan?</b> 11:24      20       MR. GAVENMAN: Objection. 11:24      21       MR. GRENDI: Objection, relevance. 11:24      22       THE WITNESS: That's not possible. 11:24   </p>	<p>1       THE WITNESS: I don't know. This is a little 11:25      2     too far, you know. 11:25      3       MR. GRENDI: I'm just going to hop in here. 11:25      4       If we went to the judge with this right now, she 11:25      5     would say why are you asking these questions, please 11:25      6     move it along. I'm pretty sure that's what she would 11:25      7     say, because this has zero connection to whether or 11:25      8     not Eastern Profit -- 11:26      9       THE WITNESS: Can I get some water? 11:26      10      MR. GRENDI: -- and Strategic Vision -- 11:26      11      MR. GREIM: Why don't we do this. We have 11:26      12     five minutes left. I mean, this goes directly to 11:26      13     whether Mr. Guo is working with the regime or not. 11:26      14     This would be one of the contacts, but let's take a 11:26      15     break. We have five minutes left on the tape. Let's 11:26      16     take about a five- or ten-minute break. 11:26      17       VIDEOGRAPHER: This end Disk No. 1, going off 11:26      18     the record. The time is now 11:28 a.m. 11:26      19       [Recess.] 11:41      20       VIDEOGRAPHER: This begins Disk No. 2 in the 11:41      21     video deposition of Lianchao Han. We are back on the 11:41      22     record. The time is 11:43 a.m. 11:41   </p>
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<p>1      BY MR. GREIM: 11:24      2       <b>Q. Why do you say that?</b> 11:24      3       A. Wang Qishan invited Bannon to China 11:24      4     before he even know who Miles Kwok is. 11:24      5       <b>Q. Before who knows who Miles Kwok was?</b> 11:24      6       A. Before Steve had ever heard his name. 11:24      7       <b>Q. How do you know that?</b> 11:24      8       A. Because at the time, he was -- the 11:24      9     timeline, just look at the timeline. I forgot when 11:24      10    he went to China, but that was way before Steve met 11:25      11    with the Miles Kwok. 11:25      12       <b>Q. Do you know who arranged the Bannon-Wang</b> 11:25      13     <b>Qishan meeting?</b> 11:25      14       MR. GRENDI: Objection. 11:25      15       MR. GAVENMAN: Objection. 11:25      16       THE WITNESS: Is that relevant? I think John 11:25      17    Thornton. 11:25      18      BY MR. GREIM: 11:25      19       <b>Q. And do you know whether Bannon discussed</b> 11:25      20     <b>Guo with Wang Qishan?</b> 11:25      21       MR. GAVENMAN: Objection. 11:25      22       MR. GRENDI: Objection. How would he know? 11:25   </p>	<p>1      BY MR. GREIM: 11:41      2       <b>Q. Okay. Mr. Han --</b> 11:41      3       A. Yes. 11:41      4       <b>Q. -- I'm going to make sure something is</b> 11:41      5     <b>very clear from our last series of questions. Is it</b> 11:41      6     <b>true that you have knowledge of the purpose of the</b> 11:42      7     <b>Bannon trip to Wang Qishan?</b> 11:42      8       MR. GRENDI: Objection. 11:42      9       MR. GAVENMAN: Objection. 11:42      10      You can answer. 11:42      11       THE WITNESS: I don't know exactly what's the 11:42      12     purpose, but I know for a fact it has nothing to do 11:42      13     with Miles Kwok. 11:42      14      BY MR. GREIM: 11:42      15       <b>Q. Well, now that you -- I have to ask you</b> 11:42      16     <b>how do you know for a fact it has nothing to do with</b> 11:42      17     <b>it?</b> 11:42      18       A. Because Steve talked to me about his 11:42      19     trip. 11:42      20       <b>Q. Okay. What did he tell you? What did</b> 11:42      21     <b>he tell you the purpose of the trip was?</b> 11:42      22       MR. GRENDI: Objection. Why are we talking 11:42   </p>

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<p>1 about a trip when the witness just said it has 11:42      2 nothing to do with this case? 11:42      3 MR. GREIM: Well, he said it doesn't. He was 11:42      4 about to tell us why it doesn't. 11:42      5 THE WITNESS: First of all, Steve didn't know 11:42      6 Miles. He never heard of Miles before this trip. I 11:42      7 mean during this during this trip. 11:42      8 He met with Miles on October 6th, I think I 11:42      9 believe of 2017. So he didn't know, and that meeting 11:42      10 was about economic nationalism. Wang Qishan lectured 11:43      11 him for the entire session of his meeting. That's 11:43      12 what Bannon told me. 11:43      13 BY MR. GREIM: 11:43      14 Q. Is that the extent of your knowledge 11:43      15 about the trip? 11:43      16 A. Correct. 11:43      17 Q. All right. Have you ever discussed the 11:43      18 trip with Guo Wengui? 11:43      19 A. No, because the meeting, you know, what 11:43      20 Steve and Miles, when we sit down, Steve told what 11:43      21 happened. 11:43      22 Q. Okay. I'm sorry. Steve told Miles what 11:43   </p>	<p>1 that I can show you here in a moment, but I just want 11:45      2 you to take a look at this and tell me whether, now 11:46      3 having looked through this document, you have ever 11:46      4 heard of it or seen it before. 11:46      5 A. Never heard, never seen this before. 11:46      6 Can I see the Chinese version? 11:46      7 Q. Yes. I'm going to play for you a 11:46      8 newscast with, I believe, the Mirror in which Mr. 11:46      9 Wengui discusses -- I'm sorry -- Mr. Guo discusses 11:46      10 the letter. I'm going to go ahead for our counsel 11:46      11 here and I'm going to go ahead and mark as Exhibit 6 11:46      12 a transcription and translation of that. Again, this 11:46      13 has been previously produced to counsel and the 11:47      14 translation is accompanied with an affidavit of the 11:47      15 translator, Jessica Ju. This is from 11:47      16 https://youtu.be/7qVmEsw_ZX8, and it was published on 11:47      17 January 18, 2018. 11:47      18 What I'm going to do, sir, is I'm going to try 11:47      19 to make sure you can see my screen, because the 11:47      20 newscast -- 11:47      21 [Video presentation.] 11:47      22 MR. GREIM: I'm pausing it. What I'm going 11:48   </p>
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<p>1 happened? 11:43      2 A. Steve, me, Miles, we have a dinner, 11:43      3 several dinners. So I think at the beginning, you 11:44      4 know, he mentioned about this trip. He described the 11:44      5 meeting with Wang Qishan. 11:44      6 Q. Are you aware of a letter that Mr. Guo 11:44      7 wrote to President Xi in August of 2017? 11:44      8 A. I didn't. 11:44      9 Q. Have you ever heard of that before? 11:44      10 A. No. 11:44      11 [Han Exhibit No. 5 was 11:44      12 marked for identification.] 11:45      13 BY MR. GREIM: 11:45      14 Q. I'm going to show you what we are 11:45      15 marking as Exhibit 5, and what I'm showing you here 11:45      16 is a certified translation that was filed in the New 11:45      17 York County Supreme Court in another matter, and this 11:45      18 purports to be a letter from Guo Wengui to the 11:45      19 Honorable Leader, parentheses "S". It starts with 11:45      20 "Greetings" and it's signed, Respectfully, s/Guo 11:45      21 Wengui, August 26, 2017. 11:45      22 Now, I've got an actual Chinese copy of this 11:45   </p>	<p>1 to do is move my computer closer to you without 11:48      2 wrecking the entire setup that we have here. 11:48      3 THE WITNESS: Yeah. Oh, that's the Chinese 11:48      4 version? 11:48      5 MR. GREIM: Yes, sir, but I just encourage 11:48      6 you to listen, and if there were even a way for you 11:48      7 to pause as you need to -- 11:48      8 THE WITNESS: Yeah. 11:48      9 MR. GREIM: -- I'll try to allow that. 11:48      10 THE WITNESS: Okay. 11:48      11 MR. GREIM: And what you may do is, if you 11:48      12 know how to work this -- 11:48      13 THE WITNESS: That's fine. I can listen. 11:48      14 MR. GREIM: Okay. 11:48      15 [Video presentation.] 11:49      16 THE WITNESS: This is a half an hour thing. 11:49      17 Are we going to go through everything? 11:49      18 [Mr. Greim gestures in the negative.] 11:50      19 [Continued video presentation.] 11:53      20 MR. GREIM: All right. I have stopped this 11:56      21 exactly at seven minutes and thirty seconds. As the 11:56      22 witness points out, this particular clip is a total 11:56   </p>

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<p>1 of about 23 minutes and eventually goes to 31:43. We 11:56      2 won't play the entire clip here, but we can if it's 11:56      3 necessary. 11:56      4 BY MR. GREIM: 11:56  <b>Q. So my question to the witness, first of 11:56</b>  <b>all, is that -- what did you see, first of all, on 11:56</b>  <b>the video? 11:56</b>      8 A. What did I see? 11:56      9 <b>Q. Sure. 11:56</b>      10 MR. GRENDI: I'll just object to line of 11:56      11 questioning. 11:56      12 THE WITNESS: Just, you know, it's his letter 11:56      13 to the Chinese leaders and he explains who he 11:56      14 addressed it to. 11:56      15 BY MR. GREIM: 11:56  <b>Q. And who is interviewing Mr. Guo? 11:56</b>      17 A. Chen Xiaoping. 11:57  <b>Q. Who is that? 11:57</b>      19 A. Chen Xiaoping is the host of Mirror Tv. 11:57  <b>Q. This is the TV program you mentioned 11:57</b>      21 earlier? 11:57      22 A. Correct. 11:57   </p>	<p>1 THE WITNESS: Just exactly the same letter, 11:58      2 just done into segments. 11:58      3 BY MR. GREIM: 11:58  <b>Q. Okay. And so let me ask you again, now 11:58</b>  <b>that you've seen it in Chinese -- 11:58</b>      6 A. Yeah. 11:58  <b>Q. -- and you've heard Mr. Guo talking 11:58</b>  <b>about it, had you ever heard of this letter before 11:58</b>      9 today? 11:58      10 MR. GAVENMAN: Objection, form. 11:58      11 THE WITNESS: No. This is the first time I 11:58      12 saw this video clip. I didn't know the letter. 11:58      13 BY MR. GREIM: 11:58  <b>Q. Okay. Well, if we could go to the 11:58</b>  <b>English version -- 11:58</b>      16 A. Yes. 11:58  <b>Q. -- you'll see that the beginning of the 11:58</b>  <b>letter after the word "Greetings" says: "Thank you 11:58</b>  <b>very much for your hospitality to meet members of my 11:58</b>  <b>family and staff yesterday." 11:59</b>      21 <b>Do you see that? 11:59</b>      22 A. Yes. 11:59   </p>
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<p>1 <b>Q. All right. And do you recognize Mr. Guo 11:57</b>  <b>and Mr. Guo's voice answering his questions? 11:57</b>      3 A. Yes. 11:57  <b>Q. And did you hear Mr. Guo to ask the host 11:57</b>  <b>that the letter be put up on the screen? 11:57</b>      6 A. Correct. 11:57      7 MR. GRENDI: Objection. 11:57      8 BY MR. GREIM: 11:57  <b>Q. And did you see the letter? 11:57</b>      10 A. Yes. 11:57  <b>Q. How many pages did it have? 11:57</b>      12 A. Four or five. Four. 11:57  <b>Q. Were you able to read it in Chinese? 11:57</b>      14 A. Yes. 11:57  <b>Q. And then after the actual letter was 11:57</b>  <b>shown, did you see a transcription that followed 11:57</b>  <b>while some piano music played? 11:57</b>      18 A. Yes. 11:57  <b>Q. What were Chinese characters in the 11:57</b>  <b>transcription after the letter? 11:57</b>      21 MR. GRENDI: Objection. 11:57      22 MR. GAVENMAN: Objection. 11:57   </p>	<p>1 MR. GAVENMAN: I'm just going to object to 11:59      2 the extent this is not an accurate translation, just 11:59      3 to that extent, but we can go on. 11:59      4 MR. GRENDI: Same objection. 11:59      5 BY MR. GREIM: 11:59  <b>Q. Now, we can go back to Chinese text, if 11:59</b>  <b>you would like, sir, to take a look at the -- 11:59</b>      8 A. Yeah. Let's go back and see exactly. I 11:59      9 think there is a mistranslation here. I can see at 11:59      10 least one error here, but that's the Chinese -- the 11:59      11 English version. It's the beginning of the letter, I 11:59      12 think. 12:00  <b>Q. You're now looking at the beginning of 12:00</b>  <b>the letter? 12:00</b>      15 A. Yeah. Can we enlarge this a little bit? 12:00  <b>Q. I'm afraid we can't. 12:00</b>      17 A. I can't read it. 12:00  <b>Q. Let me see if I can, sir. 12:00</b>      19 A. There it goes. 12:00  <b>Q. And you can feel free to use my controls 12:00</b>  <b>on the my computer to move. We may have a few other 12:00</b>  <b>questions on other pages here. 12:00</b> </p>

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<p>1 [Witness peruses document.] 12:00      2 THE WITNESS: Yeah. 12:00      3 BY MR. GREIM: 12:01      4 Q. So was there a mistranslation in the 12:01      transcription that I showed you? 12:01      5 A. Just for this part, no, for the first 12:01      paragraph. 12:01      6 Q. Okay. Now, are you aware of a -- other 12:01      7 than the meeting that we talked about earlier in May, 12:01      8 are you aware of another meeting between Mr. Guo and 12:01      9 any Chinese officials? 12:01      10 A. No. 12:01      11 Q. Do you see under paragraph 1 of the 12:01      12 English translation, under paragraph 1, Mr. Guo is 12:01      13 making certain requests of the Chinese leaders? Are 12:01      14 you aware of him having made such requests in or 12:01      15 around August of 2017? 12:01      16 MR. GRENDI: Objection. 12:01      17 MR. GAVENMAN: Objection, form. 12:01      18 THE WITNESS: I didn't know he made any 12:01      19 requests, specific requests, like that, but I know 12:01      20 there were -- he tried to negotiation -- tried to 12:02   </p>	<p>1 translation. 12:03      2 BY MR. GREIM: 12:03      3 Q. Well, what -- which of those conditions, 12:03      4 are any of the conditions inaccurate in the 12:03      transcription? 12:03      5 A. Yeah. Roughly, it's correct, but he's 12:03      6 talking about like overseas, to stop overseas use the 12:03      7 army. He uses a specific term, sui jin. Sui jin 12:03      8 means -- how to translate? 12:03      9 Sui jin is the Communist hired thugs or hired 12:03      10 crowds that's suing him. So that was not translated 12:03      11 accurately. 12:04      12 Q. I see. So does that apply to the phrase 12:04      13 that says "drop the illegal action that is being 12:04      14 taken against me overseas"? 12:04      15 A. Yeah, but he's specifically -- by those 12:04      16 hired, you know, sui jin, army of Communist Party. 12:04      17 Q. Let me take you to the first -- if you 12:04      18 continue in that paragraph, there are some text in 12:04      19 bold. It's in bold both in Chinese characters and in 12:04      20 English translation. 12:04      21 A. Yeah. 12:04   </p>
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<p>1 negotiate to protect his employees, his assets. 12:02      2 That, I know in general. 12:02      3 BY MR. GREIM: 12:02      4 Q. If you look on -- let's go to the second 12:02      5 paragraph. You'll see he says: "The key condition 12:02      6 for me to desist from revealing information is that 12:02      7 you take my name off the Red Notice -- 12:02      8 A. Yes. 12:02      9 Q. -- "permit me to resume the operation of 12:02      10 my business in Hong Kong and drop the legal action 12:02      11 that is being taken against me overseas." 12:02      12 Did I read that correctly? 12:02      13 A. Yes. 12:02      14 Q. And can you satisfy yourself that that 12:02      15 is, in fact, what's in the Chinese version of the 12:02      16 letter? 12:02      17 And if you need to, if it's not on this page, 12:02      18 we can toggle to the next. 12:02      19 A. Okay. 12:03      20 [Witness peruses document.] 12:03      21 THE WITNESS: It's roughly correct, but it's 12:03      22 not straight -- you know, it's not an accurate 12:03   </p>	<p>1 Q. And it says: "My current situation can 12:04      2 be summed up in eight Chinese characters", colon and 12:04      3 then after that, it's bolded: "I am now doing things 12:04      4 not out of my own volition and talking things that I 12:04      5 do not really mean." 12:04      6 Do you see that? 12:05      7 A. I saw that. 12:05      8 Q. Is that a correct Chinese translation? 12:05      9 A. Roughly, yes. 12:05      10 Q. Did Mr. Guo ever express a similar 12:05      11 sentiment to you? 12:05      12 MR. GRENDI: Objection. 12:05      13 BY MR. GREIM: 12:05      14 Q. About his speech in the United States? 12:05      15 MR. GAVENMAN: Objection, form. 12:05      16 MR. GRENDI: Objection. 12:05      17 THE WITNESS: No. 12:05      18 BY MR. GREIM: 12:05      19 Q. Then if you go on, there's some more 12:05      20 that's bolded. I want to ask you about the English 12:05      21 sentence that says: "My public exposures of 12:05      22 information before." 12:05   </p>

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<p>1 A. Where is that? 12:05</p> <p>2 Q. It's about two sentences later? 12:05</p> <p>3 A. Here, in the English? 12:05</p> <p>4 Q. Oh, yes, in the English. I'm just going 12:05</p> <p>5 to point out to you. 12:05</p> <p>6 A. Okay. 12:05</p> <p>7 Q. "My public exposures of information 12:05</p> <p>8 before was done under coercion. My choice to perform 12:05</p> <p>9 publicly was not voluntary." 12:05</p> <p>10 Do you see that in the Chinese? 12:05</p> <p>11 A. Yeah. It's not a very accurate 12:05</p> <p>12 translation. 12:06</p> <p>13 Q. Okay. How would you, if you could -- 12:06</p> <p>14 what is inaccurate about it? 12:06</p> <p>15 MR. GAVENMAN: Objection to form. 12:06</p> <p>16 MR. GRENDI: Objection. 12:06</p> <p>17 THE WITNESS: Let's see. So he basically 12:06</p> <p>18 says they hold the entire situation, it's not alone I 12:06</p> <p>19 can decide and control, and it's involved with my -- 12:06</p> <p>20 the country I reside in and other relevant interests, 12:06</p> <p>21 stakeholders. 12:06</p> <p>22 BY MR. GREIM: 12:06</p>	<p>1 very end and then we're just about done with this, 12:07</p> <p>2 sir. 12:08</p> <p>3 A. All right. 12:08</p> <p>4 Q. If you go to page 5 of the 12:08</p> <p>5 transcription -- actually, I think it's really page 12:08</p> <p>6 3. Sorry. You'll see that there is a little six. 12:08</p> <p>7 A. Yeah. 12:08</p> <p>8 Q. It says "A few". 12:08</p> <p>9 A. Yes. 12:08</p> <p>10 Q. Actually, before we get there, it's 12:08</p> <p>11 really under five. I apologize. You'll see it says: 12:08</p> <p>12 "I will put our national interest first and I am 12:08</p> <p>13 willing to devote my life to protecting our nation's 12:08</p> <p>14 interest to defend Chairman Xi Jinping's value as our 12:08</p> <p>15 nation's core faith and make ultimate dedication of 12:08</p> <p>16 myself to safeguard Chairman Xi Jinping." 12:08</p> <p>17 Did I read that correctly? 12:08</p> <p>18 A. Yes, you read that correctly, but let me 12:08</p> <p>19 just see what's the Chinese version. 12:08</p> <p>20 Q. Absolutely. Let's go there. 12:08</p> <p>21 [Video presentation.] 12:09</p> <p>22 THE WITNESS: This is No. 5? 12:09</p>
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<p>1 Q. That actually wasn't the sentence I read 12:06</p> <p>2 to you, but I see that. 12:06</p> <p>3 A. Right. Right, but after that, he says, 12:06</p> <p>4 you know, like the whistle-blowing exposure before 12:06</p> <p>5 was forced and also like a reluctant choice. 12:07</p> <p>6 Q. I see. 12:07</p> <p>7 A. So that would be my understanding of the 12:07</p> <p>8 translation. 12:07</p> <p>9 Q. So instead of done under coercion and 12:07</p> <p>10 was not voluntary, you would say forced? 12:07</p> <p>11 A. Yes, because how you translate the whole 12:07</p> <p>12 paragraph, the context of the thing. 12:07</p> <p>13 Q. Did Mr. Guo ever tell you that he felt 12:07</p> <p>14 he was forced to engage in his whistle-blowing speech 12:07</p> <p>15 in the U.S.? 12:07</p> <p>16 MR. GRENDI: Objection. 12:07</p> <p>17 THE WITNESS: I don't think so, because it 12:07</p> <p>18 depends on, you know, how it's forced, forced by the 12:07</p> <p>19 situation, forced by the individual. He didn't 12:07</p> <p>20 specify that. 12:07</p> <p>21 BY MR. GREIM: 12:07</p> <p>22 Q. If you could go to -- let's go to the 12:07</p>	<p>1 BY MR. GREIM: 12:09</p> <p>2 Q. Yes, sir. Do we need to go to another 12:09</p> <p>3 page? 12:09</p> <p>4 A. No, no. This is the page. 12:09</p> <p>5 [Witness peruses document.] 12:09</p> <p>6 THE WITNESS: Yeah. I get it. 12:10</p> <p>7 BY MR. GREIM: 12:10</p> <p>8 Q. Is that an accurate translation? 12:10</p> <p>9 MR. GRENDI: Objection. 12:10</p> <p>10 THE WITNESS: It's not -- you know, I think 12:10</p> <p>11 it's exaggerated a little bit on the side of -- yeah. 12:10</p> <p>12 It's a different tone, yeah, different. The scale of 12:10</p> <p>13 emphasis, yeah, roughly correct. 12:10</p> <p>14 BY MR. GREIM: 12:10</p> <p>15 Q. Okay. I mean, the English translation 12:10</p> <p>16 ends with an exclamation point. Right? 12:10</p> <p>17 A. Right. Chinese also. 12:10</p> <p>18 Q. Chinese also, okay. So what is it in 12:10</p> <p>19 the English translation that you would change then? 12:10</p> <p>20 I want to make sure I understand precisely where you 12:10</p> <p>21 disagree with this translation. 12:10</p> <p>22 MR. GRENDI: Objection. 12:10</p>

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<p>1           THE WITNESS: Let's see I think it's the           12:10      2 tone. Yeah. It's not -- I mean, it's roughly           12:10      3 correct.   12:10      4 BY MR. GREIM:   12:10      5           <b>Q. Okay.</b>                                       12:10      6           A. That's my -- the tone seems to me more           12:10      7 weighted on, you know, how he's going to devote           12:11      8 everything.   12:11      9           <b>Q. Do you have any doubt that Mr. Guo</b>           12:11      10 <b>actually sent this letter?</b>                           12:11      11           A. I have no idea if he did or not.               12:11      12           <b>Q. Okay. Let me take you now to the final</b>           12:11      13 <b>part of this paragraph 6, and that may go into the</b>           12:11      14 <b>next page. Do we need to change yet?</b>                   12:11      15           A. No, not yet. Let me just see what you           12:11      16 want.   12:11      17           <b>Q. So you see six says: "A few small</b>           12:11      18 <b>suggestions from the bottom of Wengui's heart."</b>       12:11      19           A. Yeah.                                       12:11      20           <b>Q. Then he has actually, A, B, C, D, E, F,</b>       12:11      21 <b>and G.</b>   12:11      22           A. Correct.                                   12:11   </p>	<p>1           <b>resources momentarily into best serving Chairman Xi</b>   12:13      2 <b>Jinping's Chinese Dream", exclamation point.</b>           12:13      3           A. Yes.                                       12:13      4           <b>Q. Is that fair?</b>                           12:13      5           A. Yes.                                       12:13      6           <b>Q. And then under -- let's skip to "G".</b>           12:13      7           A. "G"?                                       12:13      8           <b>Q. Which might have to be the next page</b>           12:13      9 <b>now.</b>   12:13      10          A. Yeah.                                       12:13      11          [Video presentation.]                           12:13      12          THE WITNESS: Yes.                               12:13      13 BY MR. GREIM:                                       12:14      14           <b>Q. And the English translation is in bold</b>       12:14      15 <b>and italics. It says: "Assign me tasks to</b>               12:14      16 <b>accomplish in furtherance of our national interests</b>   12:14      17 <b>initiative and engage in Chairman Xi Jinping's global</b>   12:14      18 <b>strategy so that I can redeem myself by my good</b>      12:14      19 <b>service, demonstrating my patriotism and loyalty to</b>   12:14      20 <b>Chairman Xi Jinping."</b>                               12:14      21           <b>Did I read that correctly?</b>                       12:14      22          A. This is number -- it should be number       12:14   </p>
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<p>1           <b>Q. And so if you look under "A", he says:</b>           12:11      2 <b>"Give Wengui an opportunity to chant for our nation."</b>   12:11      3           <b>And then the translator says that they have</b>       12:12      4 <b>added Communist China. Do you see?</b>                   12:12      5           A. Yeah.   12:12      6           <b>Q. That's not in the Chinese. Correct?</b>           12:12      7           A. No. That's not in Chinese.                   12:12      8           <b>Q. Then he says: "In advocating our</b>           12:12      9 <b>nation's legal system solely for propagandizing</b>       12:12      10 <b>Chairman Xi Jinping's call for the Rule of Law in</b>   12:12      11 <b>China", exclamation point.</b>                           12:12      12          A. Right, but that's also -- this               12:12      13 translation is bad. It's not accurate. Yeah. It       12:12      14 is, you know, like advocating for nation's legal       12:12      15 system beauty.   12:12      16           <b>Q. Okay. And does it --</b>                       12:12      17          A. There's no for propaganda. You know,       12:12      18 like a -- yeah. There is that propaganda. Sorry.   12:12      19 Advocate, you can see advocate for Xi Jinping's Rule   12:12      20 of Law in Chinese. It's a matter of translation.       12:12      21           <b>Q. Okay. And then if you look at "B":</b>           12:13      22          <b>"Can you consider to convert Wengui's influence and</b>   12:13   </p>	<p>1           what? Let's see.                                   12:14      2           <b>Q. "G", 6(g).</b>                                   12:14      3           A. One, two, three, four, five, six, seven.   12:14      4 The last one?   12:14      5           <b>Q. Correct.</b>                                   12:14      6           A. Yeah. Yes.                                   12:14      7           <b>Q. Is that an accurate translation?</b>       12:15      8           A. Not quite.                                   12:15      9           <b>Q. What is off in the translation?</b>       12:15      10          A. I think he says let's redeem myself,       12:15      11 like let me correct my mistakes and perform, you   12:15      12 know, like contribute. Yeah.                           12:15      13           <b>Q. So other than -- so you would change</b>   12:15      14 <b>"redeem" to "correct my mistakes"?</b>               12:15      15          A. Yeah.                                       12:15      16           <b>Q. And will you have any change to good</b>   12:15      17 <b>service, demonstrating my patriotism and loyalty to</b>   12:15      18 <b>Chairman Xi Jinping?</b>                               12:15      19          A. That is -- it's not accurate               12:15      20 translation, because I want to use the translation,   12:16      21 direct translation, literal translation, use the       12:16      22 result to express my support of Xi and my patriots.   12:16   </p>
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1	<b>Q. Very well. Okay. Now, have you ever heard Guo Wengui express similar sentiments?</b>	12:16	1	MR. GRENDI: Objection to form.	12:18
2	A. No.	12:16	2	THE WITNESS: I don't specifically know that.	12:18
3	<b>Q. And when you helped to set up the meeting between Strategic Vision and Guo Wengui, you were not aware of this letter?</b>	12:16	3	BY MR. GREIM:	12:18
4	A. No.	12:16	4	<b>Q. Did he do it after this?</b>	12:18
5	<b>Q. Do you know whether Guo Wengui received the specific instructions he was asking for in this letter?</b>	12:16	5	MR. GRENDI: Objection.	12:18
6	MR. GAVENMAN: Objection to form.	12:16	6	MR. GAVENMAN: Objection.	12:18
7	MR. GRENDI: Objection.	12:16	7	THE WITNESS: I think there's plenty he did	12:18
8	THE WITNESS: No, but he explained what	12:16	8	after that, but I just didn't follow whatever he	12:18
9	instructions he got from the video.	12:16	9	said.	12:18
10	BY MR. GREIM:	12:16	10	BY MR. GREIM:	12:18
11	<b>Q. Oh. Do you believe in the video, he actually explains the instructions he did receive?</b>	12:16	11	<b>Q. And your testimony is that you have no knowledge of any other contacts -- well, let me strike that.</b>	12:18
12	A. Yes. You have to give the	12:17	12	<b>You have no knowledge of any contacts that Guo or anyone working on his behalf had with the Chinese Government after August of 2017?</b>	12:18
13	transcript of the entire thing so you would know what	12:17	13	MR. GRENDI: Objection.	12:19
14	he's talking about.	12:17	14	MR. GAVENMAN: Objection, form.	12:19
15	<b>Q. Well, is this based on what you have heard or what you see later in the transcript?</b>	12:17	15	THE WITNESS: August of 2017? No.	12:19
16	MR. GAVENMAN: Objection.	12:17	16	BY MR. GREIM:	12:19
17	<b>Q. And do you know that he did not have contacts with the Chinese Government after August of 2017?</b>	12:17	17	<b>Q. And do you know that he did not have contacts with the Chinese Government after August of 2017?</b>	12:19
18	A. I heard.	12:17	18	MR. GRENDI: Objection.	12:19
19	<b>Q. Okay. So --</b>	12:17	19	MR. GAVENMAN: Objection.	12:19
20	A. Just now.	12:17	20	THE WITNESS: I don't have any knowledge	12:19
21	<b>Q. I'm sorry. Tell us. What did he say?</b>	12:17	21	whether he has or have not.	12:19
22	A. He said --	12:17	22	BY MR. GREIM:	12:19
23	MR. GRENDI: Objection. I just want to --	12:17	23	<b>Q. Do you know whether it's true that Mr. Guo has been unable to move money from Hong Kong after he began speaking out as a dissident?</b>	12:19
24	hold on. I want to go the record. He didn't listen	12:17	25	MR. GAVENMAN: Objection.	12:20
25	to the whole video. So he's testifying as to what he	12:17	26	MR. GRENDI: Objection.	12:20
26	heard so far in the video.	12:17	27	MR. GAVENMAN: Form and asked and answered,	12:20
27	MR. GREIM: I agree. I agree.	12:17	28	I'm fairly certain.	12:20
28	THE WITNESS: Yeah. Just the beginning part,	12:17	29	You can answer, but it's been asked before.	12:20
29	he specifically -- the interview -- the reporter	12:17	30	THE WITNESS: Okay. I don't have that	12:20
30	asked him what instruction they give you. He	12:17	31	knowledge.	12:20
31	explained, basically, don't expose, you know, the	12:17	32	BY MR. GREIM:	12:20
32	high-ranking government officials', you know,	12:17	33	<b>Q. Have you advised Mr. Guo on any statements that he or his attorney has made in the press about this case?</b>	12:20
33	corruption and don't use her Twitter, expose the	12:17	34	A. About this particular case, no.	12:20
34	dirt.	12:18	35	MR. GRENDI: Objection.	12:20
35	That's basically it. That's the instruction.	12:18			
36	BY MR. GREIM:	12:18			
37	<b>Q. And do you know when Guo Wengui last exposed dirt on a high-ranking public officials?</b>	12:18			
38	MR. GAVENMAN: Objection.	12:18			

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<p>1 THE WITNESS: And except at the very 12:20      2 beginning, I advised him not to go forward with the 12:20      3 lawsuit. 12:20      4 BY MR. GREIM: 12:20  <b>5 Q. Okay. Let's forge ahead. The very --</b> 12:20  <b>6 did there come a time when you had a meeting just</b> 12:20  <b>7 with French Wallop and Mike Waller --</b> 12:20      8 A. Uh-huh. 12:20  <b>9 Q. -- before Mr. Guo was present?</b> 12:20      10 A. I don't have recollection. 12:21  <b>11 Q. Okay. Do you recall --</b> 12:21      12 A. We might. 12:21  <b>13 Q. Okay. Well, do you recall having a</b> 12:21  <b>14 meeting with them in order to determine whether you</b> 12:21  <b>15 felt comfortable connecting Strategic Vision to Mr.</b> 12:21  <b>16 Guo?</b> 12:21      17 A. I don't recall that, but I always 12:21      18 caution all the people I introduce to Miles and 12:21      19 including Hudson, that Miles, some of what he exposed 12:21      20 is verified. Some is not verified and comes from the 12:21      21 Chinese, you know, communist system and you never 12:21      22 know, you know, what to expect. 12:21   </p>	<p>1 A. Yeah. 12:23      2 <b>Q. -- I'm really referring to either French</b> 12:23  <b>3 Wallop or Mike Waller. Okay?</b> 12:23      4 A. Yes. 12:23  <b>5 Q. So did you give them any other cautions</b> 12:23  <b>6 about Mr. Guo?</b> 12:23      7 A. I don't recall. I probably did say 12:23      8 something, yeah, because as I said, I warned on both 12:23      9 sides to be cautious as they move forward. 12:23  <b>10 Q. Because in October or November of 2017,</b> 12:23  <b>11 you had only known Mr. Guo for a few months.</b> 12:23  <b>12 Correct?</b> 12:23      13 A. Correct. 12:23  <b>14 Q. And at that time, did you have some</b> 12:23  <b>15 doubt about whether everything he had told you was</b> 12:23  <b>16 true?</b> 12:23      17 MR. GRENDI: Objection to form. 12:23      18 MR. GAVENMAN: Objection. 12:23      19 THE WITNESS: I do have some doubt, but I 12:23      20 think what he's done, the whistle-blowing, is very 12:24      21 significant, is very disruptive to Chinese Communist 12:24      22 regime. So based on that, I was there to help. 12:24   </p>
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<p>1 I did caution them. At the same time, I also 12:21      2 cautioned Miles. I have never deal with Mike French 12:22      3 in a business transaction. So I didn't know if they 12:22      4 are -- you know, they can do whatever they can do. 12:22      5 So I warned both sides. 12:22  <b>6 Q. And just so the testimony is clear, at</b> 12:22  <b>7 the beginning of your answer, did you say that Mr.</b> 12:22  <b>8 Guo came from the Chinese Communist system?</b> 12:22      9 MR. GRENDI: Objection. 12:22      10 MR. GAVENMAN: Objection. 12:22      11 THE WITNESS: Come from -- everybody in China 12:22      12 comes out of the rule, the system of the CCP. That's 12:22      13 my meaning. 12:22      14 BY MR. GREIM: 12:22  <b>15 Q. Did you give Strategic Vision -- and by</b> 12:22  <b>16 the way, when I say Strategic Vision --</b> 12:22      17 A. I don't want to see your message. 12:22  <b>18 Q. Oh, you're right. You get to see</b> 12:23  <b>19 everything here.</b> 12:23      20 [Witness views computer screen.] 12:23      21 BY MR. GREIM: 12:23  <b>22 Q. When I say Strategic Vision --</b> 12:23   </p>	<p>1 BY MR. GREIM: 12:24  <b>2 Q. And that was your state of mind at the</b> 12:24  <b>3 time you introduced Mr. Guo to Strategic Vision?</b> 12:24      4 A. Correct. 12:24  <b>5 Q. Did you convey that -- did you convey</b> 12:24  <b>6 those thoughts to Strategic Vision?</b> 12:24      7 MR. GRENDI: Objection to form. 12:24      8 MR. GAVENMAN: Objection. 12:24      9 THE WITNESS: I think I did, because I said 12:24      10 some of what he said is not verifiable. You cannot 12:24      11 verify it at the time and some, indeed, has been 12:24      12 verified like HNA. 12:24      13 BY MR. 12:24  <b>14 Q. Did they include his attendance at the</b> 12:24  <b>15 Tieneman Square massacre?</b> 12:24      16 MR. GRENDI: Objection. 12:24      17 MR. GAVENMAN: Objection, form, privilege, 12:24      18 we've established. He's not answering that question. 12:25      19 THE WITNESS: I'm not answering that 12:25      20 question, yeah. 12:25      21 BY MR. GREIM: 12:25  <b>22 Q. Did you advise Strategic Vision that it</b> 12:25   </p>

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1	<b>should obtain a deposit from Mr. Guo?</b>	12:25	1	think he read it, because his English was not good at	12:27
2	MR. GRENDI: Objection.	12:25	2	the time.	12:27
3	THE WITNESS: I don't recall that. I might.	12:25	3	<b>Q. So you didn't translate it for him?</b>	12:27
4	I might have.	12:25	4	A. No.	12:27
5	BY MR. GREIM:	12:25	5	<b>Q. Do you recall what Strategic Vision's</b>	12:27
6	<b>Q. At that point, by, let's say, November</b>	12:25	6	<b>initial proposal was?</b>	12:28
7	<b>of 2017, were you aware of concerns with Mr. Guo not</b>	12:25	7	A. I didn't remember, but I think mostly	12:28
8	<b>paying everyone he had hired to do specific tasks?</b>	12:25	8	it's how to help him, media strategy, communication	12:28
9	MR. GRENDI: Objection.	12:25	9	strategy, that sort of thing.	12:28
10	MR. GAVENMAN: Objection.	12:25	10	<b>Q. Okay. Do you remember where that</b>	12:28
11	THE WITNESS: No.	12:25	11	<b>meeting was? I know your memory is not good of the</b>	12:28
12	BY MR. GREIM:	12:25	12	<b>very first meeting, but do you remember where you</b>	12:28
13	<b>Q. So other than your statement about Mr.</b>	12:25	13	<b>would have met French and Michael?</b>	12:28
14	<b>Guo, what did you -- what, if anything, did you tell</b>	12:26	14	A. I don't know where that meeting, the	12:28
15	<b>Strategic Vision about potential projects for Guo?</b>	12:26	15	first meeting, I met with them, whether it was before	12:28
16	A. Say that again.	12:26	16	we go to New York or, you know, we met in New York.	12:28
17	<b>Q. Let me just -- it was a confusing</b>	12:26	17	So but definitely, the first -- the meeting we had, I	12:28
18	<b>question.</b>	12:26	18	remember is in New York, the apartment of Miles Kwok.	12:28
19	<b>In your very first meeting with Strategic</b>	12:26	19	<b>Q. Was it around Thanksgiving?</b>	12:29
20	<b>Vision --</b>	12:26	20	A. It's November, yeah, during the time. I	12:29
21	A. Yeah.	12:26	21	don't know if it's, you know, Thanksgiving or close	12:29
22	<b>Q. -- what, if anything, did you tell</b>	12:26	22	to Thanksgiving.	12:29
		Page 126			Page 128
1	<b>Strategic Vision about projects that Guo needed done?</b>	12:26	1	MR. GREIM: All right. It is now about	12:29
2	A. I don't remember exactly the first	12:26	2	12:30. Why don't we -- I know we just took a break	12:29
3	meeting, what we discussed. I think the idea come to	12:26	3	about an hour ago. So why don't we take another	12:29
4	me to investigate through some conventional way, that	12:26	4	break for lunch. Let's make it like 45 minutes and	12:29
5	was later, probably later on, not the first meeting.	12:26	5	then we'll come back and just march through the	12:29
6	The first meeting was focused on how they can help	12:27	6	documents.	12:29
7	the communication, the P.R., but I don't remember	12:27	7	Does that make sense?	12:29
8	exactly when, you know.	12:27	8	MR. GAVENMAN: Sounds good.	12:29
9	<b>Q. Did Strategic Vision bring any documents</b>	12:27	9	MR. GREIM: Okay. Very good.	12:29
10	<b>to that first meeting?</b>	12:27	10	VIDEOGRAPHER: Going off the record. The	12:29
11	A. Yes. There is a proposal that I	12:27	11	time is now 12:31 p.m.	12:29
12	obtained pre -- before the meeting.	12:27	12	[Whereupon, at 12:31 p.m., a lunch recess was	12:29
13	<b>Q. Okay.</b>	12:27	13	taken, to reconvene at 1:15 p.m. this same day.]	12:29
14	A. To offer their services, specific	12:27	14		
15	services.	12:27	15		
16	<b>Q. Did you share that proposal with Mr.</b>	12:27	16		
17	<b>Guo?</b>	12:27	17		
18	A. I think I did.	12:27	18		
19	<b>Q. Did you share it with Mr. Gertz?</b>	12:27	19		
20	A. It had come from Gertz.	12:27	20		
21	<b>Q. Okay.</b>	12:27	21		
22	A. And I forwarded it to Miles. I don't	12:27	22		

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1	A F T E R N O O N      S E S S I O N	12:29	1	<b>not being forced to leave and lay out his long-term objectives of guiding historic change in his homeland. Did I read that right?</b>	13:23
2	VIDEOGRAPHER: We are back on the record.	13:20	2		13:23
3	The time is now 1:22 p.m.	13:20	3		13:23
4	MR. GREIM: Let the record reflect the thumb	13:20	4	A. Yes.	13:23
5	drive from which I played two video clips that the	13:21	5	<b>Q. And are those the objectives that, even</b>	13:23
6	witness viewed has been marked as Han Exhibit 7.	13:21	6	<b>apart from the Strategic Vision work, you were trying</b>	13:23
7	We'll just keep this with the original exhibits, for	13:21	7	<b>to advise Mr. Guo on?</b>	13:23
8	now at least.	13:21	8	MR. GRENDI: Objection.	13:23
9	[Han Exhibit No. 7 was	13:21	9	MR. GAVENMAN: Objection.	13:23
10	marked for identification.]	13:21	10	THE WITNESS: Yes.	13:23
11	FURTHER EXAMINATION BY COUNSEL FOR	13:21	11	BY MR. GREIM:	13:23
12	DEFENDANT/COUNTERCLAIM PLAINTIFF	13:21	12	<b>Q. Now, did you translate for Mr. Guo?</b>	13:23
13	BY MR. GREIM:	13:21	13	A. I don't think so. I gave him a rough	13:24
14	<b>Q. Okay. So, Mr. Han, earlier, we talked</b>	13:21	14	idea about what was proposed.	13:24
15	<b>about a proposal that Strategic Vision had given to</b>	13:21	15	<b>Q. And would you agree with me that most of</b>	13:24
16	<b>Mr. Gertz, who then gave to you. Do you recall that?</b>	13:21	16	<b>this document deals with, for lack of a better word,</b>	13:24
17	A. Yes.	13:21	17	<b>public relations?</b>	13:24
18	MR. GREIM: I'm going to show you what we are	13:21	18	A. Pretty much, yes.	13:24
19	marking as Exhibit 8.	13:21	19	<b>Q. Or maybe, better, it would be public</b>	13:24
20	[Han Exhibit No. 8 was	13:21	20	<b>communications?</b>	13:24
21	marked for identification.]	13:21	21	A. I think it's public image. Also, if you	13:24
22	MR. GREIM: I'm going to ask you take a look	13:21	22	look at the layout, help him to accomplish his	13:24
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1	at that and see if you recognize this document. It's	13:21	1	objectives here, and I would say my perception at the	13:24
2	Bates labeled SVU77 to 79, and the top of the page	13:21	2	beginning is the P.R., you know, strategic P.R.	13:24
3	says "Vision".	13:22	3	<b>Q. What was Mr. Guo's reaction after you</b>	13:24
4	There's also handwriting in the upper	13:22	4	<b>summarized this?</b>	13:24
5	right-hand corner that says "1st Mtg w/Guo".	13:22	5	A. I don't remember specifically what he	13:24
6	[Witness peruses exhibit.]	13:22	6	reacted to it, how he reacted to it. I have no	13:25
7	MR. GRENDI: Can you repeat what the question	13:22	7	recollection.	13:25
8	is?	13:22	8	<b>Q. Well, after you reviewed it, what was</b>	13:25
9	THE WITNESS: Did you ask me a question?	13:22	9	<b>your reaction to it?</b>	13:25
10	BY MR. GREIM:	13:22	10	A. I think this is, you know, for me, he	13:25
11	<b>Q. All right. So, Mr. -- do you recognize</b>	13:22	11	needs someone to steer him through this media world,	13:25
12	<b>this document, Mr. Han?</b>	13:22	12	focused world. I think he needs someone to help him.	13:25
13	A. Yeah. It looks like the original. Yes.	13:23	13	You know, that's just my understanding. I	13:25
14	<b>Q. And I'll just ask you, if look at the</b>	13:23	14	think this is perfect for him as well.	13:25
15	<b>very first paragraph, it says: "This is a vision</b>	13:23	15	<b>Q. At this point in time, did Mr. Guo have</b>	13:25
16	<b>from Mr. G."</b>	13:23	16	<b>Guo Media yet?</b>	13:25
17	<b>Is that Mr. Guo?</b>	13:23	17	A. No.	13:25
18	A. Yes.	13:23	18	MR. GRENDI: Objection.	13:25
19	<b>Q. "To remain safely in this country and</b>	13:23	19	MR. GAVENMAN: Objection.	13:25
20	<b>accomplish his mission back home."</b>	13:23	20	THE WITNESS: No.	13:25
21	<b>And then it presents a three-year roadmap to</b>	13:23	21	BY MR. GREIM:	13:25
22	<b>enable him to accomplish his immediate objectives of</b>	13:23	22	<b>Q. Have you heard of something called Guo</b>	13:25

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1	<b>Media?</b>	13:25	1	A. Yes.	13:29
2	A. No.	13:25	2	<b>Q. And then it mentions a Washington residence to show purpose and power and provide hospitality?</b>	13:29
3	<b>Q. Oh. You've never heard of that?</b>	13:25	3	<b>residence to show purpose and power and provide hospitality?</b>	13:29
4	A. I heard of Guo Media, yeah.	13:26	4	<b>Q. Now, do you recall being involved in discussions between Strategic Vision and Mr. Guo about Washington, a Washington residence?</b>	13:29
5	<b>Q. What is it?</b>	13:26	5	A. Yes.	13:29
6	A. That's his, Miles, his media platform, I think probably set up in 2018.	13:26	6	<b>Q. Now, do you recall being involved in discussions between Strategic Vision and Mr. Guo about Washington, a Washington residence?</b>	13:29
7	<b>Q. Would it surprise you to learn that Mr. Guo doesn't know who owns Guo Media?</b>	13:26	7	<b>residence to show purpose and power and provide hospitality?</b>	13:29
8	MR. GAVENMAN: Objection.	13:26	8	A. I think so. I remember that.	13:29
9	MR. GRENDI: Objection.	13:26	9	<b>Q. And do you recall, in fact, Mr. Guo talking to Strategic Vision about real estate purchases both in Washington and in New York?</b>	13:29
10	THE WITNESS: Nothing surprises me anymore.	13:26	10	MR. GREIM: Objection.	13:29
11	MR. GREIM: All right. I'm now going to hand you what's marked as Han Exhibit 9.	13:26	11	THE WITNESS: Yes. I think so.	13:29
12	[Han Exhibit No. 9 was marked for identification.]	13:26	12	BY MR. GREIM:	13:29
13	MR. GREIM: Sorry, guys. I'm just handing them over across for your own internal distribution.	13:26	13	<b>Q. For example, do you recall that they discussed even buying the former home of David Rockefeller in New York?</b>	13:29
14	MR. GRENDI: That's fine.	13:26	14	A. I didn't remember who initiated it, but I think there is such a discussion.	13:30
15	MR. GREIM: You'll see this is a four-page document Bates labeled SVUS000080 to 83, and it says "Three-Year Timeline at the top. Please take a	13:26	15	<b>Q. And were the discussions about real estate and offices mixed in with the discussions</b>	13:30
16	[Han Exhibit No. 9 was marked for identification.]	13:26	17	about public campaign?	13:30
17	MR. GREIM: Sorry, guys. I'm just handing them over across for your own internal distribution.	13:26	18	MR. GAVENMAN: Objection, form.	13:30
18	MR. GRENDI: That's fine.	13:26	19	MR. GRENDI: Objection.	13:30
19	MR. GREIM: You'll see this is a four-page document Bates labeled SVUS000080 to 83, and it says "Three-Year Timeline at the top. Please take a	13:26	20	THE WITNESS: Yeah. It's hard for me to remember exactly. I think maybe they were separate times or they were all together, yeah. Because it's part of the package, it might have yeah, more likely.	13:30
20	[Han Exhibit No. 9 was marked for identification.]	13:26	21	BY MR. GREIM:	13:30
21	MR. GREIM: You'll see this is a four-page document Bates labeled SVUS000080 to 83, and it says "Three-Year Timeline at the top. Please take a	13:26	22	<b>Q. Okay. So they were discussed at the same time?</b>	13:30
22	[Han Exhibit No. 9 was marked for identification.]	13:27	23	MR. GRENDI: Objection.	13:30
23	THE WITNESS: Yeah.	13:28	24	THE WITNESS: You know, sometimes when you talk about real estate, I think they're purely focused on real estate and not mentioned about some other part. I mean, just sometimes, that might be mixed. So I don't recall specific events.	13:30
24	BY MR. GREIM:	13:28	25	BY MR. GREIM:	13:31
25	<b>Q. And you'll see down under "Personal Presence", it says: "Create a personal presence in Washington."</b>	13:29	26	<b>Q. It's hard to generalize?</b>	13:31
26	And then it goes on. Do you see that?	13:29	27	A. Correct.	13:31
27	A. Yes.	13:29	28	<b>Q. Okay. Now, if you notice, in these four pages, there's still no discussion of a research project. Do you agree with me?</b>	13:31
28	<b>Q. On the very first page?</b>	13:29	29		13:31

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<p>1 A. Correct. 13:31</p> <p>2 Q. So let me ask you do you recall when in 13:31</p> <p>3 these discussions a research project actually began 13:31</p> <p>4 to be discussed? 13:31</p> <p>5 A. I didn't remember, but I know for a fact 13:31</p> <p>6 I was the one who talked Miles into this. I 13:31</p> <p>7 discussed with Mike and French to initiate this 13:31</p> <p>8 research project. 13:31</p> <p>9 Q. So I'm going to make sure I understand 13:31</p> <p>10 your testimony. 13:31</p> <p>11 A. Yes. 13:31</p> <p>12 Q. You -- did the research -- was the 13:31</p> <p>13 research project discussed between you and French and 13:32</p> <p>14 Mike before it was discussed with Mr. Guo? 13:32</p> <p>15 A. I didn't remember -- 13:32</p> <p>16 MR. GAVENMAN: Form. 13:32</p> <p>17 THE WITNESS: -- which comes first, but I 13:32</p> <p>18 come up with the idea, I believe to continue to 13:32</p> <p>19 disrupt the Communist regime, we need sustainable 13:32</p> <p>20 fact-based, evidence-based exposure of Chinese 13:32</p> <p>21 corruption. So I thought, you know, this project 13:32</p> <p>22 could fill into that and I discussed with -- I don't 13:32</p>	<p>1 A. No. It was purely my responsibility. 13:34</p> <p>2 Q. So do you know where -- well, let me 13:34</p> <p>3 back up. 13:34</p> <p>4 Do you understand that the initial research 13:34</p> <p>5 was to occur on a set of 15 names? 13:34</p> <p>6 A. That was the nature, I think, 13:34</p> <p>7 originally. I don't know what names would be will. 13:34</p> <p>8 Q. It was more amorphous at the beginning? 13:34</p> <p>9 A. Correct. 13:34</p> <p>10 MR. GRENDI: Objection. 13:34</p> <p>11 MR. GREIM: Well, let's see. I'm going to 13:34</p> <p>12 now show you what we're going to mark as Exhibit 10. 13:34</p> <p>13 [Han Exhibit No. 10 was 13:34</p> <p>14 marked for identification.] 13:34</p> <p>15 MR. GREIM: Wait a minute. This is a set of 13:35</p> <p>16 texts involving you, and I see -- let me make sure I 13:35</p> <p>17 didn't -- 13:35</p> <p>18 MR. GRENDI: You've got notes on one of them? 13:35</p> <p>19 MR. GREIM: I thought I did. Maybe not. 13:35</p> <p>20 Maybe I don't. 13:35</p> <p>21 MR. GRENDI: Just for the record, this is the 13:35</p> <p>22 document you produced to me last night, you produced 13:35</p>
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1	<b>Gertz before Mr. Waller was there? Do you recall</b>	13:38	1	<b>Wallop there is asking that the lunch be pushed back</b>	13:39
2	<b>that?</b>	13:38	2	<b>to one?</b>	13:40
3	A. I don't.	13:38	3	A. Um-hum.	13:40
4	<b>Q. Okay. Well, you'll see that you are</b>	13:38	4	<b>Q. I'm sorry. I'm sorry. I take that</b>	13:40
5	<b>writing to her on -- in the morning of the 12th and</b>	13:38	5	<b>back. You see that you're asking that the lunch be</b>	13:40
6	<b>you say: "Hi, French. Great meeting you. I talked</b>	13:38	6	<b>pushed back because Bannon wants an urgent meeting at</b>	13:40
7	<b>with Miles and he's eager to meet you. He wants to</b>	13:38	7	<b>11:30?</b>	13:40
8	<b>invite you to Mar a Lago now, but I think it's better</b>	13:38	8	A. Yes.	13:40
9	<b>to wait until I come back from Japan."</b>	13:38	9	<b>Q. And by the way, was it common around</b>	13:40
10	<b>And then you're proposing a meeting on the</b>	13:38	10	<b>this time for Bannon to have, you know, meetings with</b>	13:40
11	<b>following week, on November the 19th. Do you see</b>	13:38	11	<b>Mr. Guo?</b>	13:40
12	<b>that?</b>	13:38	12	MR. GAVENMAN: Objection.	13:40
13	A. Right.	13:38	13	MR. GRENDI: Objection.	13:40
14	MR. GRENDI: Objection.	13:38	14	THE WITNESS: Say that again.	13:40
15	BY MR. GREIM:	13:38	15	BY MR. GREIM:	13:40
16	<b>Q. And you mention real estate. Correct?</b>	13:38	16	<b>Q. Was it common around this time for</b>	13:40
17	A. Um-hum.	13:38	17	<b>Bannon to have meetings with Mr. Guo?</b>	13:40
18	MR. GRENDI: Objection.	13:38	18	MR. GAVENMAN: Objection.	13:40
19	BY MR. GREIM:	13:38	19	MR. GRENDI: Objection.	13:40
20	<b>Q. And you say: "His priority is the</b>	13:38	20	THE WITNESS: Common? What do you mean,	13:40
21	<b>building opposite the Treasury."</b>	13:38	21	common?	13:40
22	A. Um-hum.	13:38	22	BY MR. GREIM:	13:40
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1	<b>Q. Okay. So by this point, do you believe</b>	13:38	1	<b>Q. Was it a --</b>	13:40
2	<b>you at least met French Wallop?</b>	13:38	2	A. Common practice?	13:40
3	A. Yeah. I might have.	13:38	3	<b>Q. Yeah. Did it happen on a regular basis?</b>	13:40
4	<b>Q. And you already talked to Mr. Guo about</b>	13:38	4	A. No, but Steve Bannon is very	13:40
5	<b>her?</b>	13:38	5	unpredictable. His schedule is always messed up.	13:40
6	A. Yes.	13:38	6	Always, we have to accommodate him. So that's	13:40
7	<b>Q. Let's forge ahead here. Then you see he</b>	13:38	7	common.	13:40
8	<b>she wrote you back, your report back about Japan.</b>	13:39	8	<b>Q. I see. If you go on now to page 45,</b>	13:40
9	<b>You say: "Steve Bannon stirred up things here. I am</b>	13:39	9	<b>you'll see that Ms. Wallop asked that you not</b>	13:40
10	<b>happy."</b>	13:39	10	<b>disclose their identities to Mr. Bannon.</b>	13:41
11	<b>Did I read that right?</b>	13:39	11	A. Correct.	13:41
12	A. Yes.	13:39	12	<b>Q. And you say, in fact, Mr. Guo does not</b>	13:41
13	<b>Q. Let's continue marching on, and if you</b>	13:39	13	<b>know her name yet.</b>	13:41
14	<b>look at around November 20th, do you see that you're</b>	13:39	14	A. Correct.	13:41
15	<b>setting --</b>	13:39	15	<b>Q. And does that sound right, that you did</b>	13:41
16	A. Where is the 20th?	13:39	16	<b>not disclose her name?</b>	13:41
17	<b>Q. Oh. It's SVUS001844.</b>	13:39	17	A. I didn't, yeah, because French asked me	13:41
18	A. 44?	13:39	18	not to mention their names at all. At the early	13:41
19	<b>Q. Um-hum. You got ahead of us a little</b>	13:39	19	stage, I didn't. Steve Bannon even didn't know they	13:41
20	<b>bit there.</b>	13:39	20	were going to be in that meeting at one o'clock.	13:41
21	A. Yes.	13:39	21	<b>Q. Okay. Very good. If you -- let's flip</b>	13:41
22	<b>Q. All right. So do you see that French</b>	13:39	22	<b>ahead now to 1852.</b>	13:41

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<p>1 A. 52? 13:41</p> <p>2 Q. Um-hum. We're now into December 3rd. 13:41</p> <p>3 A. Yes. 13:41</p> <p>4 Q. Do you see that you are being sent by 13:41</p> <p>5 Ms. Wallop, it looks like, a Hotel Washington 13:42</p> <p>6 property? 13:42</p> <p>7 A. Um-hum. 13:42</p> <p>8 Q. Do you remember discussing that 13:42</p> <p>9 property? 13:42</p> <p>10 A. No. 13:42</p> <p>11 Q. All right. 13:42</p> <p>12 A. There's just so many properties being 13:42</p> <p>13 discussed. 13:42</p> <p>14 Q. Okay. Do you remember at this time -- I 13:42</p> <p>15 know there's not a lot of detail in these texts, but 13:43</p> <p>16 do you remember whether the idea of a research 13:43</p> <p>17 project had begun to be discussed by early December? 13:43</p> <p>18 A. I don't think so, not in this meeting. 13:43</p> <p>19 Q. Okay. 13:43</p> <p>20 A. Because we just set up a preliminary 13:43</p> <p>21 meeting, first meeting. 13:43</p> <p>22 Q. Okay. And did it appear to you based on 13:43</p>	<p>1 A. I think so, but -- yeah. I just don't 13:44</p> <p>2 remember. 13:44</p> <p>3 Q. By the way, do people drink alcohol when 13:44</p> <p>meals were served when they met? 13:44</p> <p>4 A. Sometimes they do. 13:44</p> <p>5 MR. GAVENMAN: Objection, form. 13:44</p> <p>6 THE WITNESS: Sometimes they don't. Steve, I 13:44</p> <p>7 think Steve didn't want to drink. 13:44</p> <p>8 BY MR. GREIM: 13:44</p> <p>9 Q. Forget about -- I'm sorry. I don't mean 13:44</p> <p>about Steve Bannon. I mean -- 13:45</p> <p>10 A. In general? 13:45</p> <p>11 Q. -- when Strategic Vision met with Mr. 13:45</p> <p>Guo. 13:45</p> <p>12 MR. GAVENMAN: Objection. 13:45</p> <p>13 THE WITNESS: I think I remember there was 13:45</p> <p>14 served alcohol, wine. 13:45</p> <p>15 BY MR. GREIM: 13:45</p> <p>16 Q. Okay. Did Mr. Guo have alcohol in these 13:45</p> <p>meetings? 13:45</p> <p>17 MR. GAVENMAN: Objection. 13:45</p> <p>18 THE WITNESS: He had some. 13:45</p>
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<p>1 don't know if it's the second or third or fourth. 13:46</p> <p>2 That, I'm not sure. 13:46</p> <p>3 BY MR. GREIM: 13:46</p> <p>4 Q. <b>By the way, does Ms. Wallop tend to use 13:46</b></p> <p>5 <b>emoticons in her text?</b> 13:46</p> <p>6 A. Say that again. 13:46</p> <p>7 Q. <b>Does Ms. Wallop tend to use emoticons in 13:46</b></p> <p>8 <b>her texts?</b> 13:46</p> <p>9 A. Emoticons is like an emoji? 13:46</p> <p>10 Q. <b>Emojis, yes.</b> 13:46</p> <p>11 Emoticons, is that even a word? I think I 13:46</p> <p>12 meant emojis. I don't even know what an emoticon is. 13:46</p> <p>13 A. Yeah. 13:46</p> <p>14 Q. <b>Okay. If you see -- now let's go ahead 13:46</b></p> <p>15 <b>now and turn to 1858.</b> 13:47</p> <p>16 A. 58. 13:47</p> <p>17 Q. <b>And December 16th, there's the long 13:47</b></p> <p>18 <b>series of texts that runs from the 16th to the 17th.</b> 13:47</p> <p>19 You're advising that you landed back from a trip and 13:47</p> <p>20 there's a -- do you see in green? Is that commentary 13:47</p> <p>21 from Ms. Wallop? 13:47</p> <p>22 A. Yeah. 13:47</p>	<p>1 Q. <b>Okay. So you don't remember checking 13:49</b></p> <p>2 <b>names, checking other contacts that she provided to 13:49</b></p> <p>3 <b>Mr. Guo?</b> 13:49</p> <p>4 A. No. 13:49</p> <p>5 Q. <b>You don't?</b> 13:49</p> <p>6 A. No. 13:49</p> <p>7 Q. <b>Do you know if Mr. Guo, if he checked 13:49</b></p> <p>8 <b>the names?</b> 13:49</p> <p>9 A. I have no idea. 13:49</p> <p>10 Q. <b>But does this indicate to you that as of 13:49</b></p> <p>11 <b>mid-December, the parties are still very much in 13:49</b></p> <p>12 <b>discussions?</b> 13:49</p> <p>13 A. Correct. 13:49</p> <p>14 Q. <b>Okay.</b> 13:49</p> <p>15 MR. GRENDI: For the record, just wait for 13:49</p> <p>16 him to finish the question. 13:49</p> <p>17 THE WITNESS: Okay. 13:49</p> <p>18 BY MR. GREIM: 13:50</p> <p>19 Q. <b>On the next page, in white, you respond 13:50</b></p> <p>20 <b>to this text from Ms. Wallop. She asked how your day 13:50</b></p> <p>21 <b>went and you say "not good".</b> 13:50</p> <p>22 A. Yes. 13:50</p>
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<p>1 remember once. 13:51</p> <p>2     <b>Q. Okay. It looks like on the 19th, the</b> 13:51</p> <p>3     <b>discussion continues here. She says: "Just checked</b> 13:52</p> <p>4     <b>with M and after three is fine for him as well."</b> 13:52</p> <p>5         <b>On the 20th, she checks again. Do you recall</b> 13:52</p> <p>6         <b>having another meeting, setting up another meeting</b> 13:52</p> <p>7         <b>with Mr. Guo and Wallop and Waller? If you need to</b> 13:52</p> <p>8         <b>page forward or backward in this to help yourself,</b> 13:52</p> <p>9         <b>please do.</b> 13:52</p> <p>10        A. Page 4? Oh. I think that trip, most 13:52</p> <p>11        likely, was looking for real estate in Washington. 13:52</p> <p>12        <b>Q. Let's move to December 21.</b> 13:53</p> <p>13        A. 21, okay. 13:53</p> <p>14        <b>Q. There, you say: "Our friend from Tokyo</b> 13:53</p> <p>15        <b>wants to know when is earliest he can come to meet."</b> 13:53</p> <p>16        A. Wants to know when is the earliest that 13:53</p> <p>17        he can come to meet. 13:53</p> <p>18        <b>Q. Is this referring to Mr. Guo or a</b> 13:53</p> <p>19        <b>different person?</b> 13:53</p> <p>20        A. It's a different person. 13:53</p> <p>21        <b>Q. So were you working with Strategic</b> 13:53</p> <p>22        <b>Vision on a different potential client?</b> 13:53</p>	<p>1         A. Yes. 13:54</p> <p>2         <b>Q. French Wallop says: "Hi there. Were</b> 13:54</p> <p>3         <b>you able to set a time to visit New York? I know you</b> 13:54</p> <p>4         <b>will let us know as the conversation unfolds."</b> 13:54</p> <p>5         <b>And then if you continue to page 1864, there's</b> 13:54</p> <p>6         <b>your response. You say: "Not yet. He is</b> 13:54</p> <p>7         <b>incommunicado."</b> 13:54</p> <p>8         <b>Then you say: "Our Japan friend arrives on</b> 13:54</p> <p>9         <b>the 2nd."</b> 13:54</p> <p>10        <b>Do you see that?</b> 13:55</p> <p>11        A. Yes. 13:55</p> <p>12        <b>Q. So was there a time in mid-December when</b> 13:55</p> <p>13        <b>Mr. Guo sort of stopped conferring with you about</b> 13:55</p> <p>14        <b>this matter?</b> 13:55</p> <p>15        MR. GAVENMAN: Objection, form. 13:55</p> <p>16        MR. GRENDI: Objection. 13:55</p> <p>17        THE WITNESS: I don't think specifically on 13:55</p> <p>18        this matter. Just he's not reachable at the time. 13:55</p> <p>19        BY MR. GREIM: 13:55</p> <p>20        <b>Q. Okay. If you go down to December 24th,</b> 13:55</p> <p>21        <b>you have another followup to Ms. Wallop. You say:</b> 13:55</p> <p>22        <b>"I talked with him and he says he wants to do it, but</b> 13:55</p>
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1	<b>Q. Okay. Do you recall this conversation?</b>	13:57	1	my understanding is he doesn't want me to sign it.	13:59
2	A. Yes. Now, I remember, yes.	13:57	2	<b>Q. Guo does not want you to sign it?</b>	13:59
3	<b>Q. And you recall that Ms. Wallop did not</b>	13:57	3	A. No. He does not.	13:59
4	<b>want to agree to return of the deposit. Correct?</b>	13:57	4	<b>Q. Let me back up for a second here before</b>	13:59
5	A. Um-hum.	13:57	5	<b>we go further.</b>	13:59
6	<b>Q. You also see she references that you,</b>	13:57	6	A. Yeah.	13:59
7	<b>yourself, would be on the hook, because as of this</b>	13:57	7	<b>Q. We can stop looking at those texts for a</b>	13:59
8	<b>time, she understood that you were going to sign the</b>	13:57	8	<b>second.</b>	13:59
9	<b>contract. Do you see that part?</b>	13:57	9	A. That's okay.	13:59
10	MR. GRENDI: Objection.	13:57	10	<b>Q. What was your role here? Did you see</b>	13:59
11	THE WITNESS: "We will have entered -- which	13:57	11	<b>yourself as an intermediary between the two sides or</b>	13:59
12	part?"	13:58	12	<b>as a representative of Guo?</b>	13:59
13	BY MR. GREIM:	13:58	13	A. I think I'm a person to facilitate this	13:59
14	<b>Q. Really, it's sort of at the bottom of</b>	13:58	14	project. I am friend on both sides. I have no	14:00
15	<b>1865 into 1866. Do you see it says -- at the very</b>	13:58	15	financial interest in there.	14:00
16	<b>bottom of 65, it says: "Since he wants you to sign."</b>	13:58	16	My entire thing is driven by the political	14:00
17	A. Yeah.	13:58	17	agenda. So I just want to get the things done, you	14:00
18	<b>Q. "And, therefore, be responsible for</b>	13:58	18	know, achieve what we said we're going to do. That's	14:00
19	<b>payments, that is also very complex and unfair to</b>	13:58	19	it.	14:00
20	<b>you."</b>	13:58	20	<b>Q. By the way, during this period, did Guo</b>	14:00
21	A. Right. What's the question?	13:58	21	<b>approach you and ask you to work for him full time?</b>	14:00
22	<b>Q. Well, do you recall that at some point,</b>	13:58	22	MR. GAVENMAN: Objection to form.	14:00
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1	<b>you were going to be the person to sign the</b>	13:58	1	THE WITNESS: He did. I don't know when.	14:00
2	<b>agreement?</b>	13:58	2	BY MR. GREIM:	14:00
3	A. It wasn't that clear at the time who's	13:58	3	<b>Q. And what was your response?</b>	14:00
4	going to sign, because, obviously, I didn't want to	13:58	4	A. I thought I said I have to think about	14:00
5	get in the middle. That was my intention from the	13:58	5	it, but it's probably, I think way before this,	14:00
6	very beginning.	13:58	6	before the project.	14:00
7	<b>Q. Well, where did the idea of you signing</b>	13:58	7	<b>Q. You don't recall telling Mr. Waller or</b>	14:00
8	<b>come from? Was it suggested by someone?</b>	13:58	8	<b>Ms. Wallop right around the time of the project that</b>	14:01
9	A. I think French wants me to sign that as	13:58	9	<b>Mr. Guo had made the suggestion to you and you were</b>	14:01
10	go-between so I can communicate better with them and	13:58	10	<b>considering it?</b>	14:01
11	with Miles. That's my recollection.	13:59	11	A. I think --	14:01
12	<b>Q. Okay. Now, why wouldn't Guo just sign</b>	13:59	12	MR. GAVENMAN: Objection to form.	14:01
13	<b>it himself?</b>	13:59	13	THE WITNESS: I didn't remember if I	14:01
14	A. That, I don't know.	13:59	14	mentioned it. I probably did, but I didn't recall	14:01
15	<b>Q. Did Guo not want to sign it himself?</b>	13:59	15	the time and the contents -- the context.	14:01
16	MR. GAVENMAN: Objection.	13:59	16	BY MR. GREIM:	14:01
17	MR. GRENDI: Objection.	13:59	17	<b>Q. Did there come a time when you</b>	14:01
18	THE WITNESS: I have no idea.	13:59	18	<b>ultimately told Mr. Guo that you wouldn't do it?</b>	14:01
19	BY MR. GREIM:	13:59	19	MR. GAVENMAN: Objection to form.	14:01
20	<b>Q. Well, did you discuss it with him?</b>	13:59	20	THE WITNESS: I never made a specific -- we	14:01
21	A. No. We hadn't got -- you know, who is	13:59	21	just leave it at that.	14:01
22	going to sign, I think we have not got that far, but	13:59	22	BY MR. GREIM:	14:01

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1	<b>Q. Well, after this time, did he ever come back to you again and say he would like you to work for him exclusively?</b>	14:01	1	officials, Wang Qishan, nephew -- not nephew -- niece's E-mail account or bank account -- I forgot -- something to that effect. Yeah.	14:03
2	A. What do you mean, after this?	14:01	2	<b>Q. And did they represent to you that they had done anything illegal?</b>	14:04
3	<b>Q. Well, let's say after December of 2017.</b>	14:01	3	A. Well, first of all, I cannot verify that is the real bank account or information. I just saw the screen shot and there's a -- you know, it showed the person's name and stuff, and so I didn't, you know, register anything of that thought.	14:04
4	A. 2017? I think we haven't discussed since. I didn't see anything at all. I didn't respond, confirm or deny or reject. He never mentioned it again.	14:01	4	<b>Q. Sure. And my question is not what you think determined. It's did they represent to you that they had done anything illegal in pulling up the information?</b>	14:04
5	<b>Q. Do you remember a moment when Ms. Wallop called you to come over to her apartment --</b>	14:02	5	A. I didn't know, because we discussed about how to do it legally, and I think this was during the project formation of what we needed to be done, how to not violate law in this country and go outside of the country and do stuff that the other country might be legally obtained, this information.	14:05
6	A. Yes.	14:02	6	<b>Q. What impact did that have on you when you saw what they pulled up on the screen?</b>	14:05
7	<b>Q. -- late at night and look at something?</b>	14:02	7	A. I first thought they have the ability, the capacity, to dig into the information Miles is looking for, I was looking for, and if it's, you know, really real. So that was my first impression.	14:05
8	MR. GAVENMAN: Objection to form.	14:02	8	So I told Miles they have the capability to get the information they needed. I mean we needed. Yeah.	14:06
9	THE WITNESS: There is some time, I think she called me to come to her house.	14:02	9	<b>Q. Now, do you have any reason to think that what they showed you wasn't real?</b>	14:06
10	BY MR. GREIM:	14:02	10	A. I don't, because it's hard -- with just the one screen shot, it's very hard to say this is the real thing.	14:06
11	<b>Q. And what was the purpose of that visit?</b>	14:02	11	<b>Q. Do you remember anything else they told you about the screen shot?</b>	14:06
12	MR. GAVENMAN: Objection to form.	14:02	12	A. Yeah. They told me they have a team that got into the system and the system, you know, we have to be very careful with the team outside of this country, and they want to be very careful and track information, because they can have some trigger mechanisms, a switch that can turn it off, and then we should monitor the accounts rather than extract the information. I think that's the only thing I	14:07
13	THE WITNESS: I think -- I don't specifically remember. It probably has to do with the project.	14:02	13		14:07
14	BY MR. GREIM:	14:02	14		14:07
15	<b>Q. Did it have to do with something that she said she could find, some research that she could find?</b>	14:02	15		14:07
16	A. Research she could find?	14:02	16		14:07
17	MR. GRENDI: Objection.	14:02	17		14:07
18	THE WITNESS: We had so many meetings in her house. So I don't, you know, specifically recall.	14:02	18		14:07
19	You know, mostly, it relate to the research projects.	14:03	19		14:07
20	BY MR. GREIM:	14:03	20		14:07
21	<b>Q. Okay. Do you recall her asking you to come over so she can show you that she was able to get into a certain bank account on her computer?</b>	14:03	21		14:07
22	A. Yes.	14:03	22		14:07
23	MR. GAVENMAN: Objection.	14:03			
24	BY MR. GREIM:	14:03			
25	<b>Q. All right. And did you come over and view it?</b>	14:03			
26	A. Yes.	14:03			
27	<b>Q. What did you see?</b>	14:03			
28	A. I saw -- I think Mike showed me that, not French, and, actually, it's a screen shot that shows one of the Chinese Government high-ranking	14:03			
29		14:03			

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1 remember.	14:07	1 <b>their own employees?</b>	14:09
2 <b>Q. Did they actually mention that to you</b>	14:07	2 MR. GAVENMAN: Objection.	14:09
3 <b>repeatedly, that it was important to monitor rather</b>	14:07	3 THE WITNESS: I think they didn't	14:09
4 <b>than, simply, breaking into the accounts?</b>	14:07	4 specifically say that's their employees. They just	14:09
5 MR. GRENDI: Objection. You can answer.	14:07	5 hire contract people to do the work. I think that's	14:09
6 THE WITNESS: Yes.	14:07	6 my recollection.	14:09
7 MR. GRENDI: Sorry.	14:07	7 BY MR. GREIM:	14:09
8 THE WITNESS: Yeah. The emphasis was on that	14:07	8 <b>Q. Let's talk now about the 15 names. We</b>	14:09
9 point.	14:07	9 <b>touched on this just a little bit earlier.</b>	14:09
10 BY MR. GREIM:	14:07	10 A. Yeah.	14:09
11 <b>Q. And was that your understanding of what</b>	14:07	11 <b>Q. Do you remember sitting with Mr. Guo --</b>	14:09
12 <b>they were supposed to be doing under the contract?</b>	14:07	12 A. Yeah.	14:10
13 MR. GAVENMAN: Objection.	14:07	13 <b>Q. -- and Ms. Wallop and Mr. Waller and</b>	14:10
14 MR. GRENDI: Objection.	14:07	14 <b>walking through a packet of the 15 names?</b>	14:10
15 THE WITNESS: Under the contract, I think	14:07	15 MR. GAVENMAN: Objection.	14:10
16 there's specifically -- it says specific information	14:07	16 THE WITNESS: I think, yeah. I think -- I	14:10
17 that, you know, they were looking for and they were	14:07	17 don't know if I were there or Yvette, because at the	14:10
18 supposed to deliver, and I think whether always	14:07	18 very beginning, maybe I was there. We talked about a	14:10
19 monitor or not always monitor and extract at one	14:08	19 fish tank of things, and the names, maybe I learned	14:10
20 time, there's no such specification, you know,	14:08	20 later, because at one point, he didn't want me to get	14:10
21 specific provision in there.	14:08	21 involved.	14:10
22 BY MR. GREIM:	14:08	22 So I didn't know the names at the time.	14:10
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1 <b>Q. So, however, your understanding is not</b>	14:08	1 Basically, I'm saying I'm a little confused about	14:10
2 <b>that the contract required them to break into the</b>	14:08	2 whether I was present when the 15 names presented,	14:10
3 <b>accounts. Correct?</b>	14:08	3 but I learned later on. At least I know who they	14:10
4 MR. GRENDI: Objection.	14:08	4 are.	14:10
5 MR. GAVENMAN: Objection.	14:08	5 BY MR. GREIM:	14:10
6 THE WITNESS: Please rephrase.	14:08	6 <b>Q. All right. By the way, when did -- when</b>	14:10
7 BY MR. GREIM:	14:08	7 <b>exactly did Yvette Wang get involved here?</b>	14:11
8 <b>Q. Sure. Your understanding is not that</b>	14:08	8 A. So when they reached -- when we	14:11
9 <b>the contract required them to break into these</b>	14:08	9 basically negotiated on the project, the contract was	14:11
10 <b>accounts, is it?</b>	14:08	10 pretty done, like how much he's going to pay, who --	14:11
11 MR. GRENDI: Objection.	14:08	11 what the chunk, tranche of information they're going	14:11
12 MR. GAVENMAN: Objection.	14:08	12 to provide, and then we solved the deposit issue.	14:11
13 THE WITNESS: Not necessarily, but the	14:08	13 How we solved it, I didn't remember, and at the time,	14:11
14 discussion, during the discussion, the deliverables	14:08	14 the basic foundation is done. So he said, I don't	14:11
15 made it very clear that three types of -- three or	14:08	15 want you to get involved; so you're out.	14:11
16 four types information that the contract is going to	14:08	16 I didn't know what was going on afterwards,	14:11
17 require. That is including the detailed information	14:08	17 how the contract restructured, because there were	14:11
18 of financial statements, bank account, credit cards,	14:09	18 changes afterward. So I have no idea.	14:11
19 all of that.	14:09	19 <b>Q. Do you recall that Mr. Guo walked away</b>	14:11
20 BY MR. GREIM:	14:09	20 <b>from the project, abandoned it, and a company called</b>	14:12
21 <b>Q. Okay. Did French and Mike tell you that</b>	14:09	21 <b>Eastern Profit came in to take his place?</b>	14:12
22 <b>all of the people working on the project would be</b>	14:09	22 MR. GAVENMAN: Objection.	14:12
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<p>1 MR. GRENDI: Objection. 14:12</p> <p>2 THE WITNESS: I didn't know it. 14:12</p> <p>3 BY MR. GREIM: 14:12</p> <p>4 <b>Q. Do you believe that happened?</b> 14:12</p> <p>5 MR. GAVENMAN: Objection. 14:12</p> <p>6 MR. GRENDI: Objection. 14:12</p> <p>7 THE WITNESS: I didn't remember or recall how 14:12</p> <p>8 he walked out. At some point, he asked me, you know, 14:12</p> <p>9 you need to step in to manage the project. 14:12</p> <p>10 BY MR. GREIM: 14:12</p> <p>11 <b>Q. So you were gone and then you were back?</b> 14:12</p> <p>12 A. Yes. 14:12</p> <p>13 [Wang Exhibit No. 12 was 14:12</p> <p>14 identified for the record.] 14:12</p> <p>15 BY MR. GREIM: 14:12</p> <p>16 <b>Q. Okay. Let's go to the names. I'm going</b> 14:12</p> <p>17 <b>to show what we've marked in another deposition as</b> 14:12</p> <p>18 <b>Exhibit 12, and you'll see that this is Wang Exhibit</b> 14:12</p> <p>19 <b>12. It starts at SVUS000171 and goes to 258, and if</b> 14:13</p> <p>20 <b>you thumb through, you'll see it follows the same</b> 14:13</p> <p>21 <b>format always. There is a number with someone's</b> 14:13</p> <p>22 <b>name, and then behind it is some information about</b> 14:13</p>	<p>1 MR. GAVENMAN: Okay. 14:14</p> <p>2 BY MR. GREIM: 14:14</p> <p>3 <b>Q. All right. So tell me what do you</b> 14:14</p> <p>4 <b>recall about this document?</b> 14:14</p> <p>5 A. I remember this is -- I don't remember I 14:14</p> <p>6 saw this in my Miles' place. Probably I saw it 14:14</p> <p>7 through French, at French's house, but I'm not, you 14:14</p> <p>8 know, a hundred percent sure. 14:14</p> <p>9 <b>Q. Do you remember that this is a document</b> 14:14</p> <p>10 <b>that Mr. Guo showed to Mr. Wallop and -- Mr. Waller</b> 14:15</p> <p>11 <b>and Ms. Wallop?</b> 14:15</p> <p>12 A. Most likely. 14:15</p> <p>13 MR. GRENDI: Objection. 14:15</p> <p>14 MR. GAVENMAN: Objection. 14:15</p> <p>15 BY MR. GREIM: 14:15</p> <p>16 <b>Q. And did you know that -- well, do you</b> 14:15</p> <p>17 <b>know where these names came from?</b> 14:15</p> <p>18 MR. GAVENMAN: Objection. 14:15</p> <p>19 THE WITNESS: I don't know where it comes 14:15</p> <p>20 from, but I know this is probably what Miles wanted 14:15</p> <p>21 them to look into. 14:15</p> <p>22 BY MR. GREIM: 14:15</p>
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1	<b>Q. Do you remember telling Ms. Wallop and Mr. Waller that the \$200 hundred was probably an exaggeration?</b>	14:16	1	A. Wang Qishan, W-A-N-G, Q-I-S-H-A-N.	14:18
2		14:16	2	<b>Q. This is the same person that Bannon had met with. Right?</b>	14:18
3		14:16	3		14:18
4	A. I probably did.	14:16	4	A. Yes, and Mu Jen Ju is another person	14:18
5	<b>Q. So did there come a time when you did study the names and information in this packet?</b>	14:16	5	that is a Chinese security chief. He's also in here.	14:19
6		14:16	6	He persecuted Miles' family.	14:19
7	A. Yeah.	14:16	7	<b>Q. Now, do you know whether Mr. Guo ended up getting research on these individuals from some other source other than Strategic Vision?</b>	14:19
8	<b>Q. When was that?</b>	14:16	8		14:19
9	A. I don't recall the exact date.	14:16	9		14:19
10	<b>Q. Do you remember why you would have looked through the names?</b>	14:16	10	MR. GRENDI: Objection.	14:19
11		14:16	11	MR. GAVENMAN: Objection.	14:19
12	A. Why would he look?	14:16	12	THE WITNESS: That, I don't know.	14:19
13	<b>Q. No. Why you would have?</b>	14:17	13	BY MR. GREIM:	14:19
14	MR. GAVENMAN: Objection.	14:17	14	<b>Q. Do you know whether he shared this information with any of research group after Strategic Vision?</b>	14:19
15	THE WITNESS: I think -- I don't remember exactly how when they first come out. The first time	14:17	15		14:19
16	I look at this name, I don't remember exactly, but I did see the list either in New York or in French's house, but I just don't remember exactly where.	14:17	16		14:19
17		14:17	17	A. I didn't know that either.	14:19
18		14:17	18	MR. GAVENMAN: Objection.	14:19
19		14:17	19	BY MR. GREIM:	14:19
20	BY MR. GREIM:	14:17	20	<b>Q. Do you know whether he ever hired a group called ASOG out of Texas?</b>	14:19
21	<b>Q. Okay. Do you remember forming any -- let me just ask you this: Do you remember having any</b>	14:17	21		14:19
22		14:17	22	A. ASOG? No.	14:19
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1	<b>thoughts about whether some of these names would be good subjects for research?</b>	14:17	1	<b>Q. Do you know whether he hired an individual named Adam Craft?</b>	14:19
2		14:17	2	A. No.	14:19
3	A. I think they're all good subjects for research.	14:17	4	<b>Q. Does that name ring a bell to you?</b>	14:19
4		14:17	5	A. Not at all.	14:19
5	<b>Q. Why is that?</b>	14:17	6	<b>Q. Does the name ASOG sound familiar to you?</b>	14:19
6	A. Because this is the key group in the control of China's bank system and investment.	14:17	7		14:19
7		14:17	8	A. Not at all.	14:20
8	<b>Q. So do you know that that's what all these names have in common?</b>	14:17	9	<b>Q. So what did Mr. Guo tell you about this list, if anything?</b>	14:20
9		14:18	10	A. He didn't really discuss this list with me at all, but when I saw it, I know what he's after.	14:20
10	A. Yes, except --	14:18	11		14:20
11	MR. GAVENMAN: Objection.	14:18	12		14:20
12	THE WITNESS: -- there's -- huh?	14:18	13	<b>Q. Is some of the same information that's in this list already on the internet? Have you seen it on there?</b>	14:20
13	MR. GAVENMAN: Objection to form. You can answer.	14:18	14		14:20
14		14:18	15	MR. GRENDI: Objection.	14:20
15	THE WITNESS: Except there's also like the former party chief's grandson, but for Wang Qishan's group, many of the names here that were in Wang Qishan's group, I think they're all involved in Chinese banking corruption.	14:18	16	MR. GAVENMAN: Objection.	14:20
16		14:18	17	THE WITNESS: There might be some.	14:20
17		14:18	18	BY MR. GREIM:	14:20
18		14:18	19	<b>Q. Do you have any understanding about who actually paid Strategic Vision, if anyone, for the work under this agreement?</b>	14:20
19		14:18	20		14:20
20	BY MR. GREIM:	14:18	21		14:20
21	<b>Q. What's the name? Could you spell out the name that you're telling us? Wang?</b>	14:18	22		14:20
22		14:18			
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<p>1 MR. GRENDI: Objection. 14:20</p> <p>2 THE WITNESS: I have no idea. 14:20</p> <p>3 BY MR. GREIM: 14:20</p> <p>4 <b>Q. Do you know if it was Guo himself?</b> 14:20</p> <p>5 MR. GAVENMAN: Objection. 14:21</p> <p>6 THE WITNESS: I have no idea. 14:21</p> <p>7 BY MR. GREIM: 14:21</p> <p>8 <b>Q. Do you know whether Guo consulted with anyone else in coming up with the names?</b> 14:21</p> <p>9 <b>Q. Do you know whether Guo planned to share the research results from this agreement with any other person?</b> 14:21</p> <p>10 MR. GAVENMAN: Objection. 14:21</p> <p>11 MR. GRENDI: Objection. 14:21</p> <p>12 THE WITNESS: He might have, but he didn't mention that to me. 14:21</p> <p>13 BY MR. GREIM: 14:21</p> <p>14 <b>Q. So do you recall, roughly, the date when</b> 14:21</p>	<p>1 A. No. 14:22</p> <p>2 <b>Q. Why not?</b> 14:22</p> <p>3 A. Because I know she is with him for, you know, 16 years at the time. So he trusted her very much. 14:22</p> <p>4 <b>Q. But why would Mr. Guo tell other people that he did not trust her?</b> 14:23</p> <p>5 MR. GAVENMAN: Objection. 14:23</p> <p>6 MR. GAVENMAN: Objection. 14:23</p> <p>7 THE WITNESS: I have no idea. 14:23</p> <p>8 BY MR. GREIM: 14:23</p> <p>9 <b>Q. Well, do you know why you, once again, replaced Yvette Wang later on in the parties' dealings?</b> 14:23</p> <p>10 MR. GRENDI: Objection. 14:23</p> <p>11 MR. GAVENMAN: Objection. 14:23</p> <p>12 THE WITNESS: I think he tried to salvage the project. He saw the project falling apart because he didn't get what he is paying for and he thought maybe I can better communicate with French and Mike's team and get what he's looking for. 14:23</p> <p>13 BY MR. GREIM: 14:24</p>
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1	<b>and about the Chinese Government --</b>	14:25	1	MR. GAVENMAN: Objection.	14:27
2	A. Right.	14:25	2	THE WITNESS: It's possible, yes. Hong Kong	14:27
3	<b>Q. -- do you agree that it would be prudent</b>	14:25	3	has a different system, but China has a lot of	14:27
4	<b>not to use a Chinese entity or a Chinese bank to pay</b>	14:25	4	difference there.	14:27
5	<b>Strategic Vision under the contract?</b>	14:25	5	BY MR. GREIM:	14:27
6	MR. GRENDI: Objection.	14:25	6	<b>Q. When did you first hear of the entity</b>	14:27
7	MR. GAVENMAN: Objection.	14:25	7	<b>called Eastern Profit?</b>	14:27
8	THE WITNESS: I didn't -- I -- from the very	14:25	8	A. I don't think I ever heard that term	14:27
9	beginning, we want to keep this highly confidential.	14:25	9	until this case, you know, showed up.	14:27
10	Everything we do has to be, you know, like very	14:25	10	<b>Q. Did you know that Mr. Guo's daughter is</b>	14:27
11	cautious, and whether I made that specific	14:25	11	<b>the sole shareholder and director of Eastern Profit?</b>	14:27
12	suggestion, I don't remember, but if I did, it must	14:25	12	MR. GRENDI: Objection.	14:27
13	be based on that principle.	14:25	13	MR. GAVENMAN: Objection.	14:27
14	BY MR. GREIM:	14:25	14	THE WITNESS: No.	14:27
15	<b>Q. And that would be common sense, wouldn't</b>	14:25	15	BY MR. GREIM:	14:27
16	<b>it?</b>	14:25	16	<b>Q. Do you know whether Mr. Guo typically</b>	14:27
17	MR. GRENDI: Objection.	14:25	17	<b>has his children hold companies that he uses for his</b>	14:27
18	MR. GAVENMAN: Objection.	14:25	18	<b>projects?</b>	14:27
19	THE WITNESS: It is not necessarily Chinese	14:25	19	A. I didn't.	14:28
20	company. I think it's how confidential, how	14:25	20	MR. GRENDI: Objection.	14:28
21	trustworthy they are, not the entities, from where.	14:26	21	MR. GAVENMAN: Objection.	14:28
22	It's the discrete nature of the entity that matters.	14:26	22	THE WITNESS: I didn't know.	14:28
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1	BY MR. GREIM:	14:26	1	BY MR. GREIM:	14:28
2	<b>Q. Well, what about the ability of Chinese</b>	14:26	2	<b>Q. Did you always understand that</b>	14:28
3	<b>officials to follow the wire from, you know, a</b>	14:26	3	<b>regardless of who signed the contract that that</b>	14:28
4	<b>Chinese account directly to Strategic Vision?</b>	14:26	4	<b>person or entity would be reporting to Mr. Guo?</b>	14:28
5	MR. GRENDI: Objection.	14:26	5	MR. GRENDI: Objection.	14:28
6	MR. GAVENMAN: Objection.	14:26	6	MR. GAVENMAN: Objection to form.	14:28
7	THE WITNESS: Well, yeah. It's definitely	14:26	7	THE WITNESS: Yes.	14:28
8	easier to track if it's a Chinese company based in	14:26	8	BY MR. GREIM:	14:28
9	China.	14:26	9	<b>Q. Have you ever heard that Hansheng Wang</b>	14:28
10	BY MR. GREIM:	14:26	10	<b>was actually in charge of Eastern Profit?</b>	14:28
11	<b>Q. What about an entity based in Hong Kong?</b>	14:26	11	A. I didn't know that. I thought you said	14:28
12	MR. GAVENMAN: Objection to form.	14:26	12	his daughter.	14:28
13	MR. GRENDI: Objection.	14:26	13	<b>Q. Would it surprise to hear that in this</b>	14:28
14	MR. GAVENMAN: I'm not sure what that	14:26	14	<b>case, Eastern Profit claims that its principal is</b>	14:28
15	question even is. Can you rephrase that question?	14:26	15	<b>Hansheng Wang?</b>	14:28
16	THE WITNESS: Yes.	14:27	16	MR. GAVENMAN: Objection, form.	14:28
17	BY MR. GREIM:	14:27	17	THE WITNESS: I have no idea.	14:28
18	<b>Q. Did you understand it?</b>	14:27	18	BY MR. GREIM:	14:28
19	A. Maybe you can rephrase.	14:27	19	<b>Q. Did you ever talk to Hansheng Wang about</b>	14:28
20	<b>Q. Is it also easier to track if the money</b>	14:27	20	<b>this project at all?</b>	14:29
21	<b>comes from an entity based in Hong Kong?</b>	14:27	21	A. No.	14:29
22	MR. GRENDI: Objection.	14:27	22	<b>Q. Would it surprise if Hansheng Wang was</b>	14:29
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<p>1      <b>in charge of a research project like for this for Mr.</b> 14:29      2      <b>Guo?</b> 14:29      3      MR. GRENDI: Objection. 14:29      4      MR. GAVENMAN: Objection, form. 14:29      5      THE WITNESS: As I said, nothing surprises 14:29      6      me. 14:29      7      BY MR. GREIM: 14:29      8      <b>Q. Have you ever heard of an entity called</b> 14:29      9      <b>Celestial Tide Holdings?</b> 14:29      10     A. Never. 14:29      11     <b>Q. Do you recall that after Yvette Wang</b> 14:29      12     <b>came in to finalize the contract with Strategic</b> 14:30      13     <b>Vision that new disputes erupted?</b> 14:30      14     MR. GRENDI: Objection. 14:30      15     MR. GAVENMAN: Objection. 14:30      16     THE WITNESS: I didn't. If I did, maybe from 14:30      17     French, not from Miles or Yvette. 14:30      18     BY MR. GREIM: 14:30      19     <b>Q. Okay. If you look on December 30th,</b> 14:30      20     <b>this is on page 1867 of Han Exhibit 10.</b> 14:30      21     A. 67? 14:30      22     <b>Q. Um-hum.</b> 14:30   </p>	<p>1      <b>Q. And then if you keep going -- I think</b> 14:31      2      <b>it's still the same thread -- you'll go to page 1869.</b> 14:31      3      <b>You'll see that toward the top, she says: "Also on</b> 14:31      4      <b>other fav subject, Y mentioned on Wed she needs to</b> 14:32      5      <b>get back to NY to collect her bonus for the year. So</b> 14:32      6      <b>she would be excited that NY would be glad that we</b> 14:32      7      <b>had an agreement finally."</b> 14:32      8      <b>Does that appear to be a reference to Yvette</b> 14:32      9      <b>Wang?</b> 14:32      10     A. Correct. 14:32      11     MR. GAVENMAN: Objection. 14:32      12     MR. GRENDI: Objection. 14:32      13     BY MR. GREIM: 14:32      14     <b>Q. Does it appear to you that by December</b> 14:32      15     <b>30th, Yvette Wang was now negotiating directly with</b> 14:32      16     <b>French Wallop?</b> 14:32      17     A. Yes. 14:32      18     MR. GAVENMAN: Objection. 14:32      19     MR. GREIM: All right. Let's go ahead and 14:32      20     take a break at that point, because we're about done 14:32      21     with the video. 14:32      22     VIDEOGRAPHER: This ends Disk No. 2, going 14:32   </p>
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<p>1      A. There it is. Yeah. 14:30      2      <b>Q. You'll see that Ms. Wallop begins that</b> 14:30      3      <b>day responding to a question from you about the other</b> 14:30      4      <b>matter that you were working on.</b> 14:31      5      A. Yes. 14:31      6      <b>Q. It looks like you were taking some CLE.</b> 14:31      7      A. Yes. 14:31      8      <b>Q. And you see at the bottom of that, the</b> 14:31      9      <b>first thing she says: "What time on Tuesday? Did</b> 14:31      10     <b>you speak with NY?"</b> 14:31      11     A. Let me see. 14:31      12     <b>Q. It's right before the three emojis.</b> 14:31      13     A. Okay. "What time on Tuesday? Did you 14:31      14     speak with NY?" 14:31      15     Yeah. Yeah. That's New York. It refers to 14:31      16     Miles Kwok. 14:31      17     <b>Q. Okay. And you'll see that she goes on</b> 14:31      18     <b>that morning and sends you some hotel</b> 14:31      19     <b>recommendations?</b> 14:31      20     A. Yes. 14:31      21     <b>Q. And many other things?</b> 14:31      22     A. Yes. 14:31   </p>	<p>1      off the record. The time is now 2:34 p.m. 14:32      2      [Recess.] 14:52      3      VIDEOGRAPHER: This begins Disk No. 3 in the 14:52      4      video deposition of Lianchao Han. We are back on the 14:52      5      record. The time is 2:54 p.m. 14:52      6      BY MR. GREIM: 14:52      7      <b>Q. Mr. Han, welcome back.</b> 14:52      8      A. Thank you. 14:52      9      <b>Q. If you could, we left on page 1869, but</b> 14:52      10     <b>I've got a question for you -- this is still in</b> 14:53      11     <b>Exhibit 10 -- about the pages 1884 through 1903,</b> 14:53      12     <b>which is the last page.</b> 14:53      13     A. Right. 14:53      14     <b>Q. And my question for you is would you</b> 14:53      15     <b>agree with me that everything from 1884 to 1903</b> 14:53      16     <b>refers to matters other than the Strategic Vision</b> 14:53      17     <b>Eastern Profit contract?</b> 14:53      18     A. I think most the time, most of it, yes. 14:53      19     That's correct, except maybe 86. 14:53      20     <b>Q. Oh.</b> 14:53      21     A. I think that looks like -- 14:53      22     <b>Q. Yeah.</b> 14:53   </p>
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<p>1 A. -- about their disputes. 14:53</p> <p>2 Q. Okay. And that's a text exchange on 14:53</p> <p>3 February 26th, it looks like. Right? 14:53</p> <p>4 A. Yes. 14:54</p> <p>5 Q. Okay. All right. Then I guess -- all 14:54</p> <p>6 right. I follow you. I guess on February 28th, on 14:54</p> <p>7 1887, that is about the lawsuit as well. 14:54</p> <p>8 A. Correct. I mean the dispute of some 14:54</p> <p>9 sort. 14:54</p> <p>10 Q. Okay. So would you agree with me, 14:54</p> <p>11 though, that everything else in here is about other 14:54</p> <p>12 work that you were discussing with Ms. Wallop? 14:54</p> <p>13 A. Correct. 14:54</p> <p>14 Q. Did any of those dealings come to 14:54</p> <p>15 fruition? 14:54</p> <p>16 A. No. 14:54</p> <p>17 Q. Let me ask you -- let's go back to 1869. 14:54</p> <p>18 A. Yeah. 14:54</p> <p>19 Q. And I want you to focus on after the 14:54</p> <p>20 three question marks that end a sentence somewhere 14:54</p> <p>21 about in the middle or so. 14:55</p> <p>22 A. 89? 14:55</p>	<p>1 A. Um-hum. 14:56</p> <p>2 Q. Did you have any understanding that 14:56</p> <p>3 Yvette Wang was a project manager on this? 14:56</p> <p>4 MR. GAVENMAN: Object to the form. 14:56</p> <p>5 MR. GRENDI: Objection. 14:56</p> <p>6 THE WITNESS: I didn't know until maybe 14:56</p> <p>7 later. 14:56</p> <p>8 BY MR. GREIM: 14:56</p> <p>9 Q. Okay. 14:56</p> <p>10 A. Not at that point. 14:56</p> <p>11 Q. Had you ever heard that title used with 14:56</p> <p>12 respect to Yvette Wang, that she was a project 14:56</p> <p>13 manager? 14:56</p> <p>14 A. I didn't know. I didn't, no. 14:56</p> <p>15 Q. Now you said until maybe later. Was 14:56</p> <p>16 there some point where you did learn that she was 14:56</p> <p>17 project manager? 14:57</p> <p>18 MR. GAVENMAN: Objection to form. 14:57</p> <p>19 MR. GRENDI: Objection. 14:57</p> <p>20 THE WITNESS: I don't think they ever used 14:57</p> <p>21 the project manager, but she is in charge of the 14:57</p> <p>22 project. 14:57</p>
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<p>1 Q. On 1869. 14:55</p> <p>2 A. 69? 14:55</p> <p>3 Q. Yeah. 14:55</p> <p>4 A. Sorry. Okay. 14:55</p> <p>5 Q. Three question marks, and then Ms. 14:55</p> <p>6 Wallop says: "I naturally asked tea or water ginger 14:55</p> <p>7 ale, and her comment, quote, no, we need to talk 14:55</p> <p>8 about agreement. I spoke for two hours with HK and 14:55</p> <p>9 they told me I cannot sign for monthly amount, 14:55</p> <p>10 exclamation point, but her boss told her to do it and 14:55</p> <p>11 come back with signed doc." 14:55</p> <p>12 Did I read that right? 14:55</p> <p>13 A. Um-hum. 14:55</p> <p>14 Q. Now, did you ever hear Yvette Wang or 14:55</p> <p>15 Mr. Guo talk about having to check with individuals 14:55</p> <p>16 in Hong Kong? 14:56</p> <p>17 A. No. 14:56</p> <p>18 Q. If you go to page 1871, after the emojis 14:56</p> <p>19 toward the top, you'll see: "She said and as she 14:56</p> <p>20 kept saying with abundant authority, I am project 14:56</p> <p>21 manager. I decide." 14:56</p> <p>22 Do you see that? 14:56</p>	<p>1 BY MR. GREIM: 14:57</p> <p>2 Q. If you look at page 1879 and go to the 14:57</p> <p>3 top -- 14:57</p> <p>4 A. Yeah. 14:57</p> <p>5 Q. -- you see this is a carryover from the 14:57</p> <p>6 previous page. 14:57</p> <p>7 A. Right. 14:57</p> <p>8 Q. But Ms. Wallop is sending you a piece 14:57</p> <p>9 about HNA that was in "The Financial Times". Do you 14:57</p> <p>10 see that? 14:58</p> <p>11 A. Okay. 14:58</p> <p>12 [Witness peruses exhibit.] 14:58</p> <p>13 THE WITNESS: Okay. 14:58</p> <p>14 BY MR. GREIM: 14:58</p> <p>15 Q. And then your response to her is: "I 14:58</p> <p>16 gave the story to WSJ a week ago. They're too slow, 14:58</p> <p>17 but we have more details." 14:58</p> <p>18 And then continuing to the next page: "My 14:58</p> <p>19 advice is to focus on what already in place to 14:58</p> <p>20 harvest and what will be harvested would be harvested 14:58</p> <p>21 in the next batch. Good luck." 14:58</p> <p>22 Did I read the right? 14:58</p>

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<p>1 A. Yes. 14:58</p> <p>2 Q. <b>What was your intent -- first of all,</b> 14:58</p> <p>3 <b>were you talking to her about the Strategic Vision</b> 14:58</p> <p>4 <b>work?</b> 14:58</p> <p>5 MR. GAVENMAN: Objection to form. 14:58</p> <p>6 MR. GRENDI: Objection. 14:58</p> <p>7 THE WITNESS: When was this? 14:58</p> <p>8 Okay. But we have more detail. Okay. Yeah. 14:58</p> <p>9 I know what -- can you reframe your question, please? 14:59</p> <p>10 BY MR. GREIM: 14:59</p> <p>11 Q. <b>Sure. Were you speaking with her about</b> 14:59</p> <p>12 <b>the Strategic Vision work on the research?</b> 14:59</p> <p>13 MR. GRENDI: Objection. 14:59</p> <p>14 MR. GAVENMAN: Objection, form. 14:59</p> <p>15 THE WITNESS: Yeah. It looks like it. 14:59</p> <p>16 BY MR. GREIM: 14:59</p> <p>17 Q. <b>And what was your advice to her?</b> 14:59</p> <p>18 A. I don't remember specifically. It looks 14:59</p> <p>19 like my advice is to focus on what's already in place 14:59</p> <p>20 to harvest and what will be harvested in the next 14:59</p> <p>21 batch. Yeah. I think that I advised them to follow 14:59</p> <p>22 the schedule of the deliverables, don't deviate from 14:59</p>	<p>1 supposed to touch them, even look into them. I don't 15:01</p> <p>2 know if that's true or not, but I said my point is 15:01</p> <p>3 even if you have five people you can't touch, but 15:01</p> <p>4 there's so many on the list. At least you need to 15:01</p> <p>5 produce something substantial that will satisfy Miles 15:01</p> <p>6 and the contractual, you know, obligations and 15:01</p> <p>7 satisfy Miles; otherwise, I said we're going to be 15:01</p> <p>8 trouble. I think that's what I see coming. Miles 15:02</p> <p>9 will terminate the contract. There will be lawsuits 15:02</p> <p>10 going on between the two sides, exactly what I said 15:02</p> <p>11 at the time. 15:02</p> <p>12 Q. <b>And that what you were trying to avoid</b> 15:02</p> <p>13 <b>here?</b> 15:02</p> <p>14 A. Correct. 15:02</p> <p>15 MR. GRENDI: Objection. 15:02</p> <p>16 MR. GREIM: Okay. I'm now going to show you 15:02</p> <p>17 what we marked in another deposition as Exhibit 5. 15:02</p> <p>18 [Wang Exhibit No. 5 was 15:02</p> <p>19 identified for the record.] 15:02</p> <p>20 BY MR. GREIM: 15:02</p> <p>21 Q. <b>And these are -- this is Wang Exhibit 5,</b> 15:02</p> <p>22 <b>Bates labeled SVUS000061 to 76. These are a series</b> 15:02</p>
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<p>1 A. And I don't know where we met, because 15:04      2 he was -- he didn't show up -- no. I don't remember 15:04      3 was he in the first meeting with Miles. Probably 15:04      4 not. He was behind. Yeah. I don't recall 15:04      5 specifically the date. 15:04</p> <p><b>Q. Did you feel that you had a good rapport 15:04</b>  <b>with Mr. Waller? 15:04</b></p> <p>8 A. What? 15:04</p> <p><b>Q. Did you feel that you a good rapport 15:04</b>  <b>with Mr. Waller? 15:04</b></p> <p>11 A. Yes. 15:04</p> <p><b>Q. In fact, did you share the same mentor, 15:04</b>  <b>someone named Bernie? 15:04</b></p> <p>14 A. Correct. Yes. 15:04</p> <p><b>Q. And so Bernie had been -- had served 15:04</b>  <b>with Chaing Kai-shek or something like that? 15:04</b></p> <p>17 A. He was hero in anti-Japanese war. He 15:04      18 was involved in the KMT, the Taiwan Government 15:04      19 intelligence. 15:05</p> <p><b>Q. I see. So he was a mentor to you, but 15:05</b>  <b>also a mentor to Mr. Waller? 15:05</b></p> <p>22 A. Correct. 15:05</p>	<p>1 could not provide. I hope your trip is fruitful." 15:06      2 Do you see that? 15:06</p> <p>3 A. Um-hum. 15:06</p> <p><b>Q. And then you say: Great meeting with 15:06</b>  <b>our friend. He is coming in two weeks in 15:06</b>  <b>Washington."</b> 15:06</p> <p>7 Who are you speaking of there? 15:06</p> <p>8 A. I think this is a friend from Tokyo. 15:06</p> <p><b>Q. This is Tokyo? 15:06</b></p> <p>10 A. Yeah. 15:06</p> <p><b>Q. Is Mr. Waller talking about this 15:06</b>  <b>particular project or another one? Can you tell? 15:06</b></p> <p>13 MR. GAVENMAN: Objection, form. 15:06</p> <p>14 MR. GRENDI: Objection. 15:06</p> <p>15 THE WITNESS: 62? 15:06</p> <p>16 BY MR. GREIM: 15:06</p> <p><b>Q. Um-hum. 15:06</b></p> <p>18 A. Another week's time -- I think this is 15:06      19 talking about -- he's talking about Miles' research 15:07      20 project. 15:07</p> <p><b>Q. Well, were there some things that 15:07</b>  <b>Strategic Vision said that they could not provide and 15:07</b></p>
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<p>1 A. I always correct him and maybe I didn't 15:16      2 see, you know, I would accept his offer to work for 15:16      3 him. 15:16  <b>4 Q. Well, you say you'd always correct him,</b> 15:16  <b>5 but in what sense were you disappointed with him?</b> 15:16      6 A. I -- let's see. In one sense, he won't 15:16      7 listen to me, to my advice. That's the main reason. 15:16      8 We have a political agenda, you know, we both agree 15:16      9 to push, and I always gave advice, I think sound 15:16      10 advice. He just wouldn't listen to me. 15:17  <b>11 Q. Is there anyone he does listen to?</b> 15:17      12 A. No. 15:17      13 MR. GAVENMAN: Objection, form. 15:17      14 MR. GRENDI: Objection. 15:17      15 BY MR. GREIM: 15:17  <b>16 Q. Then you see Mr. Waller responds: "If</b> 15:17  <b>17 you aren't part of the deal, I don't want to be</b> 15:17  <b>18 either."</b> 15:17      19 A. Yes. 15:17  <b>20 Q. "Anybody who is friends with Bernie and</b> 15:17  <b>21 Judd is my kind of person."</b> 15:17  <b>22 Who is Judd?</b> 15:17       </p>	<p>1 <b>want to reveal our work to anybody else."</b> 15:18      2 <b>Do you see that?</b> 15:18      3 A. Yes. 15:18  <b>4 Q. Do you remember Strategic Vision</b> 15:18  <b>5 generally being concerned about others learning about</b> 15:18  <b>6 this project?</b> 15:18      7 A. Right. 15:18      8 MR. GAVENMAN: Objection. 15:18      9 BY MR. GREIM: 15:18  <b>10 Q. Do you recall them being concerned that</b> 15:18  <b>11 their research teams or research methods might be</b> 15:18  <b>12 exposed to others?</b> 15:18      13 MR. GAVENMAN: Objection. 15:18      14 MR. GRENDI: Objection. 15:18      15 THE WITNESS: Yes. 15:18      16 BY MR. GREIM: 15:18  <b>17 Q. And did you understand that they felt</b> 15:18  <b>18 that you were the most trustworthy person on the</b> 15:18  <b>19 other side of the contract?</b> 15:18      20 MR. GAVENMAN: Objection. 15:18      21 MR. GRENDI: Objection. 15:18      22 THE WITNESS: Yes. 15:18       </p>
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<p>1 A. Judd is my boss, a senator from New 15:17      2 Hampshire. 15:17  <b>3 Q. Oh, okay. Well, then you respond: "He</b> 15:17  <b>4 thinks this will protect me."</b> 15:17  <b>5 Right?</b> 15:17      6 A. Yes. 15:17  <b>7 Q. And do you remember Mr. Guo saying that?</b> 15:17      8 A. Because -- 15:17      9 MR. GAVENMAN: Objection to form. 15:17      10 MR. GRENDI: Objection. 15:17      11 THE WITNESS: I think this is, you know, like 15:17      12 several days, kind of different days, and then he 15:17      13 didn't want me to sign. He said, you know, the 15:17      14 reason I didn't want you to get involved because I 15:17      15 want to protect you. 15:17      16 BY MR. GREIM: 15:17  <b>17 Q. Then you see -- go to the next page, 70.</b> 15:17  <b>18 Mr. Waller says: "Protect you from what? Any</b> 15:18  <b>19 attempt to do anything in court will expose</b> 15:18  <b>20 everything and that isn't worth a lousy million</b> 15:18  <b>21 dollars for either party. Do you see a necessity on</b> 15:18  <b>22 your part to have some else as a signer? I don't</b> 15:18       </p>	<p>1 BY MR. GREIM: 15:18  <b>2 Q. You see, next, Mr. Waller maybe senses</b> 15:18  <b>3 something. So he says: "What is your preference?"</b> 15:19  <b>4 And your response is that you don't really</b> 15:19  <b>5 care; is that right?</b> 15:19      6 A. Right. 15:19  <b>7 Q. Were you actually willing to sign the</b> 15:19  <b>8 contract if you had to?</b> 15:19      9 A. Yes. 15:19  <b>10 Q. If you had, do you know who would have</b> 15:19  <b>11 paid for it?</b> 15:19      12 A. I don't. 15:19  <b>13 Q. Do you see Mr. Waller say in response:</b> 15:19  <b>14 "I don't want some stranger signing it who doesn't</b> 15:19  <b>15 know what he's talking about and will jerk us around.</b> 15:19  <b>16 We must report to you and only you for quality</b> 15:19  <b>17 control."</b> 15:19      18 A. Um-hum. 15:19  <b>19 Q. Then you thank Mr. Waller for his trust.</b> 15:19      20 A. Um-hum. 15:19  <b>21 Q. Mr. Han, do you think that there was a</b> 15:19  <b>22 misunderstanding between Mr. Guo and Strategic Vision</b> 15:19       </p>

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<p>1 Waller's E-mail of concern -- or I'm sorry -- text of 15:24      2 concern, which is at SVUS000072, you see he discusses 15:24      3 the concerns that we just talk about. 15:24      4 A. Yeah. 15:24      5 Q. Then you can see your response at 10:20 15:24      6 on December 28: "I appreciate your trust. I think 15:24      7 it is important to get him to sign the contract." 15:24      8 Are you talking about Mr. Guo? 15:24      9 A. Yes. 15:24      10 Q. You see we can work on security later. 15:24      11 He wants me to work for him exclusively, which I have 15:24      12 to think about. 15:24      13 A. Correct. 15:24      14 Q. So is it something you were still 15:24      15 considering on December 28th? 15:24      16 MR. GRENDI: Objection. 15:24      17 MR. GAVENMAN: Objection. 15:24      18 THE WITNESS: Yes. 15:24      19 BY MR. GREIM: 15:24      20 Q. When did you decide that it was 15:24      21 something you really did not want to do? 15:24      22 MR. GRENDI: Objection. 15:24   </p>	<p>1 A. Yes. 15:26      2 Q. Now let me stop you there for a second. 15:26      3 Do you see that above that, back on December 28th, 15:26      4 you had forecast that Yvette wanted to talk about the 15:26      5 deposit? 15:26      6 MR. GAVENMAN: Objection. 15:26      7 MR. GRENDI: Objection. 15:26      8 MR. GAVENMAN: Form. 15:26      9 THE WITNESS: Which? 15:26      10 BY MR. GREIM: 15:26      11 Q. If you look, we're on 73. 15:26      12 A. Yeah. 15:26      13 Q. If you go right above there, that's on 15:26      14 December 30th. Go back to the 28th. 15:26      15 You see he asks you, he says: "Okay. Do you 15:26      16 think the contract will be signed today?" 15:26      17 And then you say: "Don't know. I think he 15:26      18 wants to talk about the deposit." 15:26      19 A. Right. 15:26      20 Q. So does that make you think maybe you 15:26      21 were privy to discussions between Yvette and Mr. Guo 15:26      22 before she was sent down to sign the contract? 15:26   </p>
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<p>1 MR. GAVENMAN: Objection. 15:24      2 THE WITNESS: I have no idea when. 15:24      3 BY MR. GREIM: 15:24      4 Q. Even while Yvette Wang was negotiating 15:24      5 with Strategic Vision, were you still getting some 15:25      6 information about the negotiations? 15:25      7 MR. GRENDI: Objection. 15:25      8 MR. GAVENMAN: Objection. 15:25      9 THE WITNESS: Not from Miles, but from French 15:25      10 and Mike a little bit. 15:25      11 BY MR. GREIM: 15:25      12 Q. Right. 15:25      13 A. Whatever they could share. 15:25      14 Q. So if you look, for example, at the 15:25      15 bottom of SVUS000073, you see Mike reaches out and 15:25      16 says "Please call F". Is that French? 15:25      17 A. Yes. 15:26      18 Q. We agreed on the deposit. That wasn't 15:26      19 a problem. However, today, Y came back with major, 15:26      20 reasonable changes to thing that we had agreed in 15:26      21 writing on December 12th." 15:26      22 Do you see that? 15:26   </p>	<p>1 A. Absolutely no. 15:27      2 MR. GRENDI: Objection. 15:27      3 MR. GAVENMAN: Objection. 15:27      4 THE WITNESS: No. 15:27      5 BY MR. GREIM: 15:27      6 Q. No? 15:27      7 A. No. I'm pretty sure about that. 15:27      8 Q. Okay. And let's now move to 74. After 15:27      9 Mr. Waller raises his concern about changes being 15:27      10 proposed by Yvette, you see you respond later that 15:27      11 day on the 30th and you say: "I talked with F." 15:27      12 That's French. Right? 15:27      13 A. Yes. 15:27      14 Q. It's better to wait a couple of days. 15:27      15 Miles -- that's Mr. Guo? 15:27      16 A. Yes. 15:27      17 Q. Communicated with me a few times today, 15:27      18 but did not mention the failure. 15:27      19 A. Right. 15:27      20 Q. Did you see that? 15:27      21 A. Yes. 15:27      22 Q. Now, do you think it's possible that Mr. 15:27   </p>

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1	<b>Guo didn't know about the interaction between</b>	15:27	1	<b>Q. I guess I'll tell you this. Feel free</b>	15:31
2	<b>Ms. Wang and French?</b>	15:27	2	<b>to look at the agreement if you want to. What I</b>	15:31
3	MR. GAVENMAN: Objection to form.	15:27	3	<b>really wanted to ask is if you could remember having</b>	15:31
4	MR. GRENDI: Objection.	15:27	4	<b>an understanding about it.</b>	15:31
5	THE WITNESS: I have no idea. I don't think	15:27	5	A. About the deposit?	15:31
6	it's possible.	15:27	6	<b>Q. About the deposit.</b>	15:31
7	MR. GREIM: Okay. Now, earlier, I	15:27	7	A. I didn't know the end result of what	15:31
8	represented to you that the agreement was signed on	15:28	8	they put in the signed form.	15:31
9	January 6th. I'm going to show -- we're going to go	15:28	9	<b>Q. Okay. Then what about the contents of</b>	15:31
10	ahead and mark this even though it's been used	15:28	10	<b>the weekly reports; did you have an understanding</b>	15:31
11	before. I'll just mark it again. I'm going to show	15:28	11	<b>about -- if you want to look at the agreement because</b>	15:32
12	you what we're marking as Han Exhibit 11.	15:29	12	<b>you think it will refresh your memory, do it. That's</b>	15:32
13	[Han Exhibit No. 11 was	15:29	13	<b>fine, but I first want to ask you did you have an</b>	15:32
14	marked for identification.]	15:29	14	<b>understanding about what was going to be in those</b>	15:32
15	BY MR. GREIM:	15:29	15	<b>weekly reports?</b>	15:32
16	<b>Q. I'll represent to you that this is the</b>	15:29	16	MR. GRENDI: Objection to the form.	15:32
17	<b>final signed agreement. Could you turn to page 5.</b>	15:29	17	MR. GAVENMAN: Objection.	15:32
18	<b>It's labeled Eastern-000009.</b>	15:29	18	THE WITNESS: I have a rough idea, because I	15:32
19	<b>Can you tell us the name that is signed there</b>	15:29	19	think we discussed during the meeting he wants	15:32
20	<b>for Eastern Profit?</b>	15:29	20	something of substance, not, you know, junk	15:32
21	MR. GRENDI: Objection.	15:29	21	information, and that, I'm pretty sure.	15:32
22	THE WITNESS: It looks like Han G. Wang, but	15:29	22	BY MR. GREIM:	15:32
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1	it's script. It's hard to tell, but it looks like --	15:29	1	<b>Q. Do you recall, though, the idea that</b>	15:32
2	it's hard to tell, but maybe it's Han.	15:29	2	<b>there would be a ramp-up period, as Mr. Waller texted</b>	15:32
3	BY MR. GREIM:	15:30	3	<b>to you --</b>	15:32
4	<b>Q. Does it look like Yanping Wang?</b>	15:30	4	A. Yes.	15:32
5	A. No.	15:30	5	<b>Q. -- in which the reports would not be the</b>	15:32
6	<b>Q. What's the date that you seen underneath</b>	15:30	6	<b>same as the reports that would come later?</b>	15:32
7	<b>it?</b>	15:30	7	MR. GRENDI: Objection to form.	15:32
8	A. January 6th.	15:30	8	MR. GAVENMAN: Objection.	15:32
9	<b>Q. Did you understand whether the deposit</b>	15:30	9	THE WITNESS: He mentioned that to me. I	15:32
10	<b>would be refundable?</b>	15:30	10	also expressed my concern, those types, because the	15:33
11	MR. GAVENMAN: Objection, form.	15:31	11	assignments, the target is very clear. So there's no	15:33
12	MR. GRENDI: Objection.	15:31	12	point going around and around for those information	15:33
13	THE WITNESS: I don't know. Where is it in	15:31	13	that the client already has. I made that point so	15:33
14	the paper, in the document?	15:31	14	many times in the past.	15:33
15	BY MR. GREIM:	15:31	15	BY MR. GREIM:	15:33
16	<b>Q. If you see on page 5, under Payment</b>	15:31	16	<b>Q. Do you recall after an initial meeting</b>	15:33
17	<b>Terms --</b>	15:31	17	<b>that the start date of the contract was postponed?</b>	15:33
18	A. Yeah.	15:31	18	A. Say that again.	15:33
19	<b>Q. -- that's the reference that I see, but</b>	15:31	19	<b>Q. Do you recall that after an initial</b>	15:33
20	<b>I don't want to suggest to you an answer.</b>	15:31	20	<b>meeting that the start date of the contract was</b>	15:33
21	<b>[Witness peruses exhibit.]</b>	15:31	21	<b>postponed?</b>	15:33
22	BY MR. GREIM:	15:31	22	A. I was not involved in that. So I don't	15:33
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<p>1 recall specifically. There are some glitches, you 15:34      2 know, like something going. I also remember French 15:34      3 told me in the middle, you know, the wire transfer 15:34      4 and Miles tried to stop the second payment. 15:34  <b>Q. I'm going to be -- make sure I'm a clear 15:34</b>  <b>on a couple of questions about representations. I 15:34</b>  <b>know we covered these much earlier today, but I want 15:34</b>  <b>to make sure I've got them. 15:34</b>      A. Yeah. 15:34  <b>Q. Did Guo represent to Strategic Vision 15:34</b>  <b>that he was a dissident? 15:34</b>      MR. GAVENMAN: Objection, form. 15:34      MR. GRENDI: Objection to form. 15:34      THE WITNESS: I don't think he specifically 15:34      said he's a dissident, but I think he made his 15:35      intention clear to them that he's anti-CCP. This is 15:35      the agenda. The reason we're doing this is to 15:35      disrupt the regime. 15:35      BY MR. GREIM: 15:35  <b>Q. And when you say disrupt the regime, 15:35</b>  <b>what do you mean by that? 15:35</b>      A. Just expose them to corruption, to the 15:35   </p>	<p>1 and Rule of Law and perfectly, he mentioned many 15:37      2 times to me that he strongly opposed to CGP's 15:37      3 dictatorship. 15:37  <b>Q. When did he move from second to the 15:37</b>  <b>third phase, overthrow CCP? 15:37</b>      MR. GRENDI: Objection to form. 15:37      MR. GAVENMAN: Objection to form. 15:37      THE WITNESS: I don't remember specifically. 15:37      We can go back and look at the timeline, but I don't 15:37      remember. 15:37      BY MR. GREIM: 15:37  <b>Q. Did you observe the information that was 15:37</b>  <b>loaded onto hard drives given by Yvette Wang to 15:37</b>  <b>French Wallop? 15:38</b>      MR. GAVENMAN: Objection to form. 15:38      MR. GRENDI: Objection to form. 15:38      THE WITNESS: I think it might be -- Mike 15:38      shoot me. I don't specifically remember. Maybe I 15:38      recall that, but it's all junk, full of junk. I was 15:38      disappointed with that. I expressed my 15:38      disappointment to Mike. It doesn't advance our 15:38      agenda. It doesn't help the deliverables. 15:38   </p>
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<p>1 scandals so that people will see the nature of the 15:35      2 Communist regime and even disturb internal power 15:35      3 struggle among the leaders. 15:35  <b>Q. Did he say it was his goal to actually 15:35</b>  <b>overthrow the Communist Part? 15:35</b>      MR. GAVENMAN: Objection to form. 15:35      MR. GRENDI: Objection to form. 15:35      THE WITNESS: That, I didn't remember 15:36      specifically. I think Miles has been involved from 15:36      the original -- you know, the beginning of the 19 -- 15:36      2017 to this later stage. 15:36      Until now, there's an evolution going on with 15:36      him. He's political agenda are slight different in 15:36      each stage. 15:36      BY MR. GREIM: 15:36  <b>Q. What do you mean by that? 15:36</b>      A. From the very beginning, you know, I 15:36      think he is trying to protect his family, his 15:36      employees, and his assets, his own life, and revenge. 15:36      That's the goals, three goals, he proposed, and that 15:36      later evolved into anti-CCP, but still support CGP. 15:36      Now he's moved along that line to overthrow the CCP 15:37   </p>	<p>1 Yes. I think I saw it. 15:38      2 BY MR. GREIM: 15:38  <b>Q. I'm sorry. My question was different 15:38</b>  <b>though. 15:38</b>      A. Okay. Sorry. 15:38  <b>Q. My question was whether you saw the hard 15:38</b>  <b>drives that Yvette Wang gave to French Wallop with 15:38</b>  <b>the initial information to begin the research? 15:38</b>      A. Oh, no. Maybe -- 15:38      MR. GRENDI: Objection to the form. 15:38      MR. GAVENMAN: Objection to form. 15:38      THE WITNESS: Maybe French shoot me, but 15:38      French mentioned that when he installed, there some 15:38      weird stuff going on. 15:39      BY MR. GREIM: 15:39  <b>Q. Did you -- do you remember hearing that 15:39</b>  <b>there was Malware in the drives? 15:39</b>      A. That's what French told me. 15:39      MR. GAVENMAN: Objection to form. 15:39      THE WITNESS: I have not -- yeah. 15:39      BY MR. GREIM: 15:39  <b>Q. Did you realize that that required 15:39</b> </p>
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1	MR. GRENDI: Objection to the form.	15:42	1	second week, but he wants to see you're able to get	15:44
2	THE WITNESS: Yes.	15:42	2	this information as you said.	15:44
3	BY MR. GREIM:	15:42	3	<b>Q. Do you recall whether Mr. Guo had some event or some specific reason for wanting to have information within the first couple of weeks?</b>	15:44
4	<b>Q. Do you recall that Strategic Vision reported to you that they had found Customs fraud?</b>	15:42	4	MR. GRENDI: Objection to form.	15:45
5	MR. GRENDI: Objection to form.	15:42	5	MR. GAVENMAN: Objection to form.	15:45
6	MR. GAVENMAN: Objection to form.	15:42	6	THE WITNESS: No. I think he wants to get,	15:45
7	THE WITNESS: Yes.	15:42	7	you know, his money's worth. I think also -- this is	15:45
8	BY MR. GREIM:	15:42	8	just my speculation, that he planned to have a global	15:45
9	<b>Q. Do you recall that Strategic Vision reported to you that they had found possible human trafficking?</b>	15:42	9	press conference. I don't know if he's planning to	15:45
10	MR. GAVENMAN: Objection to form.	15:42	10	expose it, but he wants to get information so he will	15:45
11	MR. GRENDI: Objection to form.	15:42	11	be comfortable when he do this, you know, global	15:45
12	THE WITNESS: Yes.	15:42	12	press release conference.	15:45
13	BY MR. GREIM:	15:42	13	BY MR. GREIM:	15:45
14	<b>Q. And did you report those facts to Mr. Guo?</b>	15:42	14	<b>Q. Did he disclose that conference to Strategic Vision?</b>	15:45
15	A. Yes.	15:42	15	MR. GAVENMAN: Objection to form.	15:45
16	<b>Q. What was his response?</b>	15:42	16	THE WITNESS: I don't know.	15:45
17	A. He -- I forgot. I cannot recall exactly	15:42	17	MR. GRENDI: Objection to form.	15:45
18	his reaction, but my impression now, I think he	15:43	18	THE WITNESS: Not in my presence. I don't	15:45
19			19	recall that, I should say.	15:46
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1	didn't understand the significance of this	15:43	1	BY MR. GREIM:	15:46
2	information and he's so into whatever is in the	15:43	2	<b>Q. Do you believe that -- or, well, let me</b>	15:46
3	contract, you know, bank statements, how they --	15:43	3	<b>-- I'll strike that. Did Mr. Guo ever end up getting</b>	15:46
4	money transferred, that type of information. That's	15:43	4	<b>research on these 15 individuals and using it for the</b>	15:46
5	just my guess.	15:43	5	<b>purposes that he claimed he would use it?</b>	15:46
6	<b>Q. So did Mr. Guo tell you that he believed</b>	15:43	6	MR. GRENDI: Objection to the form.	15:46
7	<b>that within the first week or two, he would be</b>	15:43	7	MR. GAVENMAN: Objection.	15:46
8	<b>getting actual bank statements for the subjects?</b>	15:43	8	THE WITNESS: Please rephrase that.	15:46
9	A. Say that again.	15:43	9	BY MR. GREIM:	15:46
10	<b>Q. Did Mr. Guo tell you that within the</b>	15:43	10	<b>Q. Sure. Did Mr. Guo ever end up getting</b>	15:46
11	<b>first week or two, he thought he would be getting</b>	15:43	11	<b>information on the 15 individuals and then using it</b>	15:46
12	<b>actual bank statements for the subjects?</b>	15:44	12	<b>for the purposes he claimed he was going to use</b>	15:46
13	A. No. I think he wants to see whatever is	15:44	13	<b>Strategic Vision's research?</b>	15:46
14	in the contract, not just bank accounts. I'm just	15:44	14	MR. GRENDI: Objection to the form.	15:46
15	using that as an example.	15:44	15	MR. GAVENMAN: Objection.	15:46
16	<b>Q. Sure.</b>	15:44	16	THE WITNESS: That's a hypothetic question.	15:46
17	A. Because there are three or four	15:44	17	BY MR. GREIM:	15:46
18	different categories of information. He wants to	15:44	18	<b>Q. Well, no. I wonder if it actually</b>	15:46
19	see, you know, the progress each time, each month,	15:44	19	<b>happened?</b>	15:46
20	each week that there is a progress on those type of	15:44	20	A. No. It never happened, because the	15:46
21	information. I don't think he expected to get, you	15:44	21	information is not what he's asking for.	15:47
22	know, like good intelligence in the first week or	15:44	22	<b>Q. But did he ever go to somebody else --</b>	15:47
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<p>1 A. I don't know. 15:47</p> <p>2 <b>Q. -- and get the research and then go 15:47</b></p> <p>3 <b>expose Chinese Communist leaders? 15:47</b></p> <p>4 MR. GRENDI: Objection to form. 15:47</p> <p>5 MR. GAVENMAN: Objection to form. 15:47</p> <p>6 THE WITNESS: I'm not aware of that. 15:47</p> <p>7 BY MR. GREIM: 15:47</p> <p>8 <b>Q. Do you recall Strategic Vision asking 15:47</b></p> <p>9 <b>you to ask Guo to provide some non-records-protected 15:47</b></p> <p>10 <b>names? 15:47</b></p> <p>11 MR. GRENDI: Objection to form. 15:47</p> <p>12 THE WITNESS: I don't know that. Say that 15:47</p> <p>13 again. Non-record? 15:47</p> <p>14 BY MR. GREIM: 15:47</p> <p>15 <b>Q. Do you recall that Strategic Vision 15:47</b></p> <p>16 <b>asked you to ask Guo to provide some 15:47</b></p> <p>17 <b>non-records-protected names? 15:47</b></p> <p>18 MR. GRENDI: Objection to the form. 15:47</p> <p>19 THE WITNESS: I don't remember, but there's 15:47</p> <p>20 plenty in this list that is not protected. 15:47</p> <p>21 BY MR. GREIM: 15:47</p> <p>22 <b>Q. Do you know that? 15:48</b></p>	<p>1 we still have many left. I mean here, the many left, 15:49</p> <p>2 but we didn't get anything. 15:49</p> <p>3 <b>Q. So when you said we have many left, it's 15:49</b></p> <p>4 <b>your testimony you're referring to people who are not 15:49</b></p> <p>5 <b>part of 15 whose names might have appeared? 15:49</b></p> <p>6 A. No, no, no. If you read this, 82, page 15:49</p> <p>7 82, I said even there are five RP people, that means 15:49</p> <p>8 people in this list that's under protection. There 15:49</p> <p>9 are -- we still have many left. That means many in 15:49</p> <p>10 this list that left, we can go after them, but I said 15:49</p> <p>11 we didn't get anything. I mean they didn't do 15:49</p> <p>12 anything to collect that information. It put me in a 15:49</p> <p>13 very difficult spot. 15:49</p> <p>14 More importantly, it failed to advance our 15:49</p> <p>15 agenda. So that's what said this project to do, to 15:50</p> <p>16 get information to expose the corruption of Chinese 15:50</p> <p>17 Communist, you know, high-ranking officials. 15:50</p> <p>18 <b>Q. I guess -- 15:50</b></p> <p>19 A. That's what I was upset about. 15:50</p> <p>20 <b>Q. Right, but I guess my question to you is 15:50</b></p> <p>21 <b>how do you know they were not gathering that 15:50</b></p> <p>22 <b>information? 15:50</b></p>
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<p>1 A. Yeah, because they told me they have 15:48</p> <p>2 four or five people that is under, you know, the 15:48</p> <p>3 protection, but there's so many here. Even they said 15:48</p> <p>4 15, but there's plenty, because Miles tried to stack 15:48</p> <p>5 more names into this research project. 15:48</p> <p>6 <b>Q. So did you tell Strategic Vision that it 15:48</b></p> <p>7 <b>should just move on and start investigating other 15:48</b></p> <p>8 <b>members of the family tree? 15:48</b></p> <p>9 A. Yes. It's in here. 15:48</p> <p>10 MR. GAVENMAN: Objection to form. 15:48</p> <p>11 THE WITNESS: I think in the texts made it 15:48</p> <p>12 very specific. 15:48</p> <p>13 BY MR. GREIM: 15:48</p> <p>14 <b>Q. Let's see. Show me where you're 15:48</b></p> <p>15 <b>pointing to. 15:48</b></p> <p>16 A. I don't remember, but it's in here. 15:48</p> <p>17 <b>Q. Okay. I would like to go -- because you 15:48</b></p> <p>18 <b>pointed to your text. I would like to see where you 15:48</b></p> <p>19 <b>provided that advice. It would have to be -- 15:48</b></p> <p>20 A. Okay. Let me see. Like, for example, 15:48</p> <p>21 in 82, I discuss with French, said I'm disappointed 15:48</p> <p>22 with the result. Ever there are five RP people, but 15:49</p>	<p>1 A. Because they told me they only found 15:50</p> <p>2 five or four. They are not sure how many actually 15:50</p> <p>3 are in this PR under protection, but if they only 15:50</p> <p>4 found two, I mean, or four or five, there's so many 15:50</p> <p>5 here. 15:50</p> <p>6 <b>Q. Didn't they go and get information on 15:50</b></p> <p>7 <b>someone named Frank Swen? 15:50</b></p> <p>8 MR. GRENDI: Objection. 15:50</p> <p>9 MR. GAVENMAN: Objection to form. 15:50</p> <p>10 THE WITNESS: But that's not information in 15:50</p> <p>11 the contract. The information is only on surface, 15:50</p> <p>12 some kind of, you know, like use the, you know, 15:50</p> <p>13 Social Security account, maybe some passport issue. 15:50</p> <p>14 It's not the information. You know, they touched 15:51</p> <p>15 some things, but not the information, you know, as 15:51</p> <p>16 specified. 15:51</p> <p>17 BY MR. GREIM: 15:51</p> <p>18 <b>Q. Let me ask you this: Your text says and 15:51</b></p> <p>19 <b>you've been saying today that only five are records 15:51</b></p> <p>20 <b>protected. 15:51</b></p> <p>21 A. That's what they told me. 15:51</p> <p>22 <b>Q. That's -- well, I think you're reading 15:51</b></p>

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1	MR. GRENDI: Objection to the form.	15:55	1	<b>Q. We're getting too conversational, Mr. Han.</b>	15:57
2	MR. GAVENMAN: Objection.	15:55	2	A. Yeah.	15:57
3	THE WITNESS: I don't recall. I think I probably heard from Mike and French, not from Miles.	15:55	4	<b>Q. Let me ask you another question. Have you heard of Robert S. Tucker or Duncan Levin?</b>	15:57
5	BY MR. GREIM:	15:56	5	A. Yes.	15:57
6	<b>Q. When you heard that was happening, what did you do?</b>	15:56	7	<b>Q. Have you met them?</b>	15:58
8	A. I don't remember. I was disappointed.	15:56	8	A. I met with Tucker.	15:58
9	I know that I put lots of hope in this project and I hoped its success. I feel I failed on both sides. I tried to put two sides together, have Miles to pay for this, dig up something that we can use to expose the Communist regime's corruption so that it advances our agenda on anti-CCP, but I failed because I unforeseen the difficulties of finding this information and working together.	15:56	9	<b>Q. Okay. And was he a member of the security team for Guo?</b>	15:58
10	15:56	10	A. At the time.	15:58	
11	15:56	11	MR. GAVENMAN: Objection to form.	15:58	
12	15:56	12	MR. GRENDI: Objection to form.	15:58	
13	15:56	13	BY MR. GREIM:	15:58	
14	15:56	14	<b>Q. Was this in, what, 2017?</b>	15:58	
15	15:56	15	A. Yes.	15:58	
16	15:56	16	<b>Q. Do you know if Guo used Mr. Tucker to do this research?</b>	15:58	
17	15:56	17	A. I didn't.	15:58	
18	<b>Q. But to be fair, you don't know of Mr. Guo being able to do project like this with anyone else, do you?</b>	15:56	18	MR. GAVENMAN: Objection to the form.	15:58
19	15:56	19	BY MR. GREIM:	15:58	
20	15:57	20	<b>Q. Or research similar to this?</b>	15:58	
21	MR. GRENDI: Objection.	15:57			
22	MR. GAVENMAN: Objection to form.	15:57			
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1	THE WITNESS: Can you rephrase that?	15:57	1	A. I didn't.	15:58
2	BY MR. GREIM:	15:57	2	<b>Q. Did there come a time when Tucker was no longer being used as the security person for Guo?</b>	15:58
3	<b>Q. But to be fair, you don't of Mr. Guo doing a project like this with anyone else, do you?</b>	15:57	3	A. I didn't know when they terminate his thing and I just later learned because they changed security. I didn't ask why.	15:58
4	15:57	4	<b>Q. Do you know anything about what Mr. Tucker did for Mr. Guo?</b>	15:58	
5	MR. GRENDI: Objection.	15:57	5	A. I didn't.	15:58
6	MR. GAVENMAN: Objection to form.	15:57	6	MR. GRENDI: Objection.	15:58
7	THE WITNESS: I don't know if he's doing anything or have done anything with other group whatsoever except this one.	15:57	7	MR. GAVENMAN: Objection.	15:58
8	15:57	8	THE WITNESS: Except one thing.	15:58	
9	15:57	9	MR. GAVENMAN: You can answer.	15:58	
10	15:57	10	THE WITNESS: I can answer? Okay. Except one thing. I had a breakfast with Tucker and he told me that during the breakfast that one of his	15:59	
11	<b>Q. On that point, have you ever heard of T&amp;M -- that's the letter T and M --Protection Resources?</b>	15:57	11	Communist -- we suspect a Communist agent approached him. We suspect this guy is the smear campaign commander in this country. We know he's very close to CCP, high ranking, and this guy, his name is Bruno Wu.	15:59
12	15:57	12	15:59		
13	15:57	13	15:59		
14	A. No. Can you -- who -- is that his security team?	15:57	14	15:59	
15	15:57	15	15:59		
16	<b>Q. At one time, I believe.</b>	15:57	16	15:59	
17	MR. GRENDI: Objection. I mean, who's testifying? Sorry.	15:57	17	15:59	
18	15:57	18	15:59		
19	15:57	19	15:59		
20	MR. GREIM: Yeah. That's right. Let's keep it Q&A. I'm sorry.	15:57	20	15:59	
21	15:57	21	15:59		
22	MR. GRENDI: Thanks.	15:57	22	Bruno Wu approached Tucker, offered him 20	15:59
	BY MR. GREIM:	15:57			
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1	million cash to switch to espionage on Miles, and	15:59	1	answered.	16:20
2	Tucker asked where you get the cash and he said from	15:59	2	THE WITNESS: I don't remember I saw that.	16:20
3	Jack Ma, Alibaba, and then he said they had this	16:00	3	BY MR. GREIM:	16:20
4	conversation in the open. He videotaped the	16:00	4	<b>Q. Okay. Would you have introduced</b>	16:20
5	conversation.	16:00	5	<b>Strategic Vision to the Japan and Taiwan projects if</b>	16:20
6	BY MR. GREIM:	16:00	6	<b>you thought that Strategic Vision was dishonest?</b>	16:20
7	<b>Q. Tucker did?</b>	16:00	7	MR. GAVENMAN: Objection to form.	16:20
8	A. Tucker did. That's the only thing I	16:00	8	MR. GRENDI: Objection.	16:20
9	remember during the conversation I had with him.	16:00	9	THE WITNESS: I wouldn't.	16:20
10	MR. GREIM: All right. Okay. Let's take a	16:00	10	BY MR. GREIM:	16:20
11	short break.	16:00	11	<b>Q. Okay. Let's see. I didn't ask you this</b>	16:20
12	MR. GRENDI: Yeah.	16:00	12	<b>before: Have you ever met Karin Maestrello?</b>	16:20
13	VIDEOGRAPHER: Going off the record. The	16:00	13	A. Who is that?	16:20
14	time is 4:02 p.m.	16:00	14	<b>Q. Okay. Then I guess -- have you heard</b>	16:20
15	[Recess.]	16:00	15	<b>that name before?</b>	16:21
16	VIDEOGRAPHER: We are back on the record.	16:18	16	A. Carol?	16:21
17	The time is now 4:20 p.m.	16:18	17	<b>Q. Karin Maestrello.</b>	16:21
18	BY MR. GREIM:	16:19	18	A. Karin? Karin? You mean Miles'	16:21
19	<b>Q. Mr. Han, you testified earlier that the</b>	16:19	19	assistant, Karin?	16:21
20	<b>projects being discussed at the end of the packet</b>	16:19	20	<b>Q. Yes.</b>	16:21
21	<b>we've marked as Exhibit 10, that those projects did</b>	16:19	21	A. Yes. I met. The Italian girl?	16:21
22	<b>not come to fruition?</b>	16:19	22	<b>Q. The what?</b>	16:21
		Page 250			Page 252
1	MR. GAVENMAN: Objection.	16:19	1	A. Italian girl.	16:21
2	THE WITNESS: With --	16:19	2	<b>Q. Italian girl, that's right.</b>	16:21
3	BY MR. GREIM:	16:19	3	A. Yes. I met her.	16:21
4	<b>Q. With Strategic Vision?</b>	16:19	4	<b>Q. Do you know what she does for Mr. Guo?</b>	16:21
5	A. No.	16:19	5	A. She's just --	16:21
6	<b>Q. And did that include the Taiwan project?</b>	16:19	6	MR. GAVENMAN: Objection to form.	16:21
7	A. Correct. We are still waiting for that	16:19	7	MR. GRENDI: Objection to form.	16:21
8	response.	16:19	8	THE WITNESS: My understanding is like an	16:21
9	<b>Q. Do you recall the contact in Taiwan</b>	16:19	9	assistant, office assistant.	16:21
10	<b>citing the political article as a concern in working</b>	16:19	10	BY MR. GREIM:	16:21
11	<b>with Strategic Vision?</b>	16:19	11	<b>Q. Do you recall that -- do you recall</b>	16:21
12	A. No. What's that? Can you remind me?	16:19	12	<b>hearing that Mr. Guo, himself, told Ms. Wallop and</b>	16:21
13	<b>Q. Well, are you aware of an article in</b>	16:19	13	<b>Mr. Waller that Yvette Wang was still a member of the</b>	16:21
14	<b>"Politico" about -- written about Eastern Profit and</b>	16:19	14	<b>Chinese Communist Party?</b>	16:22
15	<b>Strategic Vision in this case?</b>	16:19	15	A. No. I don't recall that.	16:22
16	A. I saw that article, but that has nothing	16:19	16	<b>Q. Do you recall telling Ms. Wallop and Mr.</b>	16:22
17	to do with the Taiwan project.	16:20	17	<b>Waller that Yvette Wang was still a member of the</b>	16:22
18	<b>Q. Oh. I understand. It doesn't discuss</b>	16:20	18	<b>Chinese Communist Party?</b>	16:22
19	<b>the Taiwan project at all, but do you recall that the</b>	16:20	19	A. I don't. I don't recall that.	16:22
20	<b>contact in the Taiwan project mentioned the</b>	16:20	20	<b>Q. Do you think it's possible and just</b>	16:22
21	<b>"Politico" article?</b>	16:20	21	<b>don't remember?</b>	16:22
22	MR. GAVENMAN: Objection, form, asked and	16:20	22	A. I think it's possible.	16:22

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1	<b>matter?</b>	16:35	1	<b>-- I'll call them fake dissidents, people are pretending to be dissidents?</b>	16:37
2	MR. GREIM: Objection, calls for speculation	16:35	2	A. Yes.	16:37
3	and opinion and also vague.	16:35	3	<b>Q. And what do those fake dissidents do?</b>	16:37
4	THE WITNESS: I think they have a good	16:35	4	<b>What is their purpose?</b>	16:37
5	intention at the beginning and want to do the right	16:35	5	A. If we're talking about specifically	16:37
6	thing, and yeah. I have no doubt, otherwise, I	16:35	6	related to this project --	16:37
7	wouldn't introduce them to Miles.	16:35	7	<b>Q. Sure.</b>	16:37
8	BY MR. GRENDI:	16:35	8	A. They're a smear campaign against Miles	16:37
9	<b>Q. Do you think they cared about the money?</b>	16:35	9	Kwok. That was number one that those fake dissidents	16:37
10	A. They do care about the money, but they	16:35	10	are doing, and in addition to that, there are a lot	16:38
11	do also care about the political agenda.	16:35	11	of people that Miles sued or countersued who are	16:38
12	<b>Q. What is Hansheng Wang look like?</b>	16:35	12	involved in fake political asylum business and they	16:38
13	A. He's a very quiet guy, very reserved,	16:35	13	are to survive to make money, like fake persons.	16:38
14	never participated in any of our meetings.	16:35	14	We have evidence to show they made -- he	16:38
15	<b>Q. Have you ever talked to him?</b>	16:35	15	helped people to fabricate fake political asylum	16:38
16	A. Occasionally.	16:35	16	cases, and there are many more. Like another guy, a	16:38
17	<b>Q. If you recall, what did you talk to him</b>	16:35	17	lawyer, also does the same thing and then he's also	16:38
18	<b>about?</b>	16:36	18	somehow connected with the MSS and the Chinese	16:38
19	A. I think it's like what he -- where he	16:36	19	Embassy.	16:38
20	come from, where's his native province and what the	16:36	20	There are so many of them. You know, I think	16:38
21	family were doing. I think he just come from a poor	16:36	21	you probably need to talk to the FBI to get this	16:38
22	family, like a rural farmer, stuff like that.	16:36	22		
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1	<b>Q. How many times have you met him?</b>	16:36	1	information.	16:39
2	A. I don't know. I don't remember exactly	16:36	2	<b>Q. So you believe the CCP is employing</b>	16:39
3	how many times, but every time I've been to the	16:36	3	<b>hundreds of fake dissidents, if you know, however</b>	16:39
4	apartment, most of the time he's there.	16:36	4	<b>many you think?</b>	16:39
5	<b>Q. Is he a dissident?</b>	16:36	5	A. I don't know how many. I have no idea	16:39
6	MR. GREIM: Objection, calls for opinion.	16:36	6	how many, but in this particular case against Miles,	16:39
7	THE WITNESS: Well, no. I think he is part	16:36	7	they hired very many to do their dirty work,	16:39
8	of, you know, Miles' team. You know, you can't	16:36	8	basically drag them into this lawsuit. At the	16:39
9	escape that. Everybody becomes a dissident now.	16:36	9	beginning, I think lots of dissidents, whether fake	16:39
10	BY MR GRENDI:	16:37	10	or real, they come to Miles and try to get support,	16:39
11	<b>Q. Anyone who does business with Miles</b>	16:37	11	financial support, from him, and when that failed and	16:39
12	<b>and --</b>	16:37	12	they started fighting over social media, criticized	16:39
13	A. Anyone associated with him, does	16:37	13	Miles, and that caused them anger from Miles' side.	16:39
14	business with him, they will all become a dissident.	16:37	14	So he started suing them, and those dissidents or	16:40
15	<b>Q. And they're putting their lives at risk</b>	16:37	15	activists, so called, they have now resources to do	16:40
16	<b>if they go back to China by doing so?</b>	16:37	16	this and then we saw the money transfer from the	16:40
17	MR. GREIM: Objection, calls for speculation.	16:37	17	Chinese Government. They use one singular law firm	16:40
18	THE WITNESS: Absolutely.	16:37	18	to do -- you know, didn't bother to change their	16:40
19	BY MR. GREIM:	16:37	19	complaints, and then we have some evidence	16:40
20	<b>Q. I'm sorry. What was your --</b>	16:37	20	independently -- it has nothing to do with Miles --	16:40
21	A. Absolutely.	16:37	21	we obtained from people that we know, showing that	16:40
22	<b>Q. Okay. Do you know if the CCP employees</b>	16:37	22	they work closely with the Chinese consulate in New	16:40
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<p>1 York, the embassy here, and money their transferred 16:40      2 from different channels to pay for the legal bill. 16:40      3       <b>Q. Are you familiar with a website called 16:40</b>      4 <b>Boxun, B-O-X-U-N, I think?</b> 16:41      5       A. Yes. 16:41      6       <b>Q. And what does that website do?</b> 16:41      7       A. That website used to be a dissident 16:41      8 Chinese language dissident -- you know, it's like a 16:41      9 free press. It's a free platform. Everybody can put 16:41      10 their stuff in there, but mostly, it's the dissidents 16:41      11 who use that website to access information, post 16:41      12 their grievances or the articles they wrote. 16:41      13       <b>Q. So it's sort of open source; anyone can 16:41</b>      14 <b>post on it?</b> 16:41      15       A. Correct. 16:41      16       <b>Q. Have fake dissidents posted information 16:41</b>      17 <b>on that website?</b> 16:41      18       A. I'm sure there are many Chinese 16:41      19 Communists, you know, like sui jin. The water army, 16:41      20 that's the term that posts stuff on that website as 16:41      21 well. 16:41      22       <b>Q. So you wouldn't necessarily trust 16:41</b></p>	<p>1       <b>Q. Do they ever post fake images?</b> 16:43      2       A. Could be. 16:43      3       <b>Q. Fake videos?</b> 16:43      4       A. That, I'm not expert on that. So I 16:43      5 can't tell. 16:43      6       <b>Q. Would it surprise you if they did?</b> 16:43      7       A. No. I'm not surprised by that. 16:43      8       <b>Q. Are you aware that Google recently took 16:43</b>      9 <b>down a number of videos from its platform that were 16:43</b>      10 <b>posted by fake dissidents?</b> 16:43      11       A. Yes. 16:43      12       <b>Q. Do you know if any of those videos were 16:43</b>      13 <b>critical of Miles Kwok or Guo Wengui?</b> 16:43      14       A. I don't know specific. I suspect, yeah. 16:43      15 There might be some. 16:43      16       <b>Q. Because Guo Wengui is a real dissident. 16:43</b>      17 <b>Right?</b> 16:43      18       A. Guo Wengui, yes. I would characterize 16:43      19 him as a real dissident. 16:44      20       <b>Q. And the CCP pretty desperate to get him 16:44</b>      21 <b>back to China and put him in jail?</b> 16:44      22       A. Correct. 16:44</p>
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<p>1       <b>anything coming out of Boxun because fake dissidents 16:41</b>      2 <b>post information there?</b> 16:42      3       A. No. It depends on the information. 16:42      4       <b>Q. Do you happen know where Exhibit 3 and 16:42</b>      5 <b>Exhibit 3 were posted, where they came from?</b> 16:42      6       A. No, I don't. Which one? 16:42      7       <b>Q. Three.</b> 16:42      8       A. Okay. Yeah. 16:42      9       <b>Q. Do you know if Boxun was the uploading 16:42</b>      10 <b>entity that put this video out there?</b> 16:42      11       A. I didn't know that. 16:42      12       <b>Q. Would you trust it if it came from 16:42</b>      13 <b>Boxun?</b> 16:42      14       A. It depends on the content. I think it 16:42      15 depends on the information. 16:42      16       <b>Q. Well, let me ask you this.</b> 16:42      17       A. Not necessarily whether it showed on the 16:42      18 platform. 16:42      19       <b>Q. Have fake dissidents posted false 16:42</b>      20 <b>information about other dissidents to disrupt the -- 16:42</b>      21 <b>I'll call it the effort to damage the CCP?</b> 16:42      22       A. Yeah. There are some. 16:42</p>	<p>1       <b>Q. In drafting the contract, was there a 16:44</b>      2 <b>concern about Mr. Wengui being identified in 16:44</b>      3 <b>connection with the research agreement?</b> 16:44      4       A. I think there was, if I recall 16:44      5 correctly. 16:44      6       <b>Q. I'll take you back to the contract. Do 16:44</b>      7 <b>you remember if there was a specific schedule in that 16:44</b>      8 <b>agreement concerning when reports were to be 16:44</b>      9 <b>delivered?</b> 16:44      10       A. Yes. There is. 16:44      11       <b>Q. Was it -- did it call for reports within 16:44</b>      12 <b>the first week, in the first month of the contract?</b> 16:45      13       A. Yeah. I think there is a specific 16:45      14 requirement on the first week. I think it's just 16:45      15 trying to show the progress, we're on the right 16:45      16 track. 16:45      17       <b>Q. Well, let's look at the agreement. What 16:45</b>      18 <b>number is that? It's number --</b> 16:45      19       MR. GAVENMAN: Eleven. 16:45      20       MR. GRENDI: Eleven. 16:45      21       MR. GREIM: Let me just say while we're 16:45      22 pulling it up, the witness was instructed not to 16:45</p>
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<p>1 answer previously about the agreement on the ground 16:45      2 it was calling for a legal conclusion. So I would 16:45      3 hope we'd have consistency. 16:45      4 MR. GAVENMAN: It depends on what the 16:45      5 question is. 16:45      6 MR. GRENDI: I wasn't asking about a legal 16:45      7 opinion on it. 16:45      8 Oh, there's my copy. I'm sorry. 16:45      9 BY MR. GRENDI:      10 Q. Just looking at the second page, it says 16:45      11 the contractor will produce progress reports on this 16:46      12 -- 16:46      13 A. Where is that? 16:46      14 Q. Oh, I'm sorry. The first full paragraph 16:46      15 on the second page. 16:46      16 A. Okay. Okay. Yes. 16:46      17 Q. It says: "The contractor will produce a 16:46      18 progress report on this financial forensic research 16:46      19 each week in the first month, one preliminary report 16:46      20 in the first month and one comprehensive historical 16:46      21 research report within three months." 16:46      22 And then it goes on to talk about update 16:46   </p>	<p>1 reports per individual subject to the client within a 16:47      2 specified timeframe as well as all relevant 16:47      3 supporting data." 16:47      4 Do you see that? 16:47      5 A. Yes. 16:47      6 Q. I'll ask you again did Strategic Vision 16:47      7 deliver weekly reports within the first month of the 16:47      8 agreement? 16:47      9 A. No. 16:47      10 Q. If you look further down the page, it 16:47      11 says: "The contractor will produce social media 16:47      12 research per individual subject to the client on a 16:47      13 weekly basis for the first month and on a monthly 16:47      14 basis thereafter except under circumstances that 16:47      15 require more frequent reporting, paren, weekly or 16:47      16 fortnightly, as the client directs or irregular 16:48      17 emergencies that the contractor may discover." 16:48      18 Do you see that? 16:48      19 A. Um-hum. 16:48      20 Q. Did Strategic Vision deliver weekly 16:48      21 reports during the first month of the agreement 16:48      22 concerning social media research? 16:48   </p>
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<p>1 reports. Do you see that section there? 16:46      2 A. Yes. 16:46      3 Q. Did Strategic Vision deliver financial 16:46      4 forensic research reports each week in the first 16:46      5 month? 16:46      6 MR. GREIM: Objection. Counsel has not 16:46      7 actually read the portion of the contract that he's 16:46      8 purporting to ask about. 16:46      9 MR. GRENDI: What are you talking about? 16:46      10 THE WITNESS: No. 16:46      11 MR. GRENDI: Would you like me to read the 16:46      12 full sentence, Mr. Greim? Is that what you're 16:46      13 getting at? 16:46      14 BY MR. GRENDI:      15 Q. Let me try it again. Looking at this 16:46      16 first full paragraph on the second page, it says: 16:46      17 "The contractor will produce a progress report on 16:46      18 this financial forensic research each week in the 16:47      19 first month, one preliminary report in the first 16:47      20 month, and one comprehensive historical research 16:47      21 report within three months and with update reports 16:47      22 sin each following month. The client may require 16:47   </p>	<p>1 MR. GREIM: Objection, foundation. 16:48      2 THE WITNESS: No. 16:48      3 BY MR. GRENDI:      4 Q. And if you look in the middle of the 16:48      5 page there, again, we're on Eastern-000006, the 16:48      6 middle paragraph says: "The contractor will produce 16:48      7 concurrent tracking research per individual subject 16:48      8 to the client on a month basis except in the first 16:48      9 month that weekly reports shall be delivered and 16:48      10 under circumstances that require more frequent 16:48      11 reporting, paren, weekly or fortnightly, end paren, 16:48      12 as the client directs up to a six-month period." 16:48      13 Do you see that? 16:48      14 A. Yes. 16:48      15 Q. Did Strategic Vision deliver weekly 16:49      16 reports on tracking research per individual subject 16:49      17 during the first month of the agreement? 16:49      18 A. No. 16:49      19 Q. Okay. Did there come a time when 16:49      20 Strategic Vision delivered a 60-gigabyte hard drive 16:49      21 of data to Eastern Profit? 16:49      22 A. Yes. 16:49   </p>

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1	<b>Q. And what was on that hard drive?</b>	16:49	1	A. Is this relevant?	16:51
2	A. It's lots of junk information.	16:49	2	<b>Q. Well, that's what I'm going to get at</b>	16:51
3	<b>Q. Was any of that information the kind of</b>	16:49	3	<b>here, because my understanding would probably be that</b>	16:51
4	<b>useful reporting that Eastern Profit would have</b>	16:49	4	<b>you don't want to reveal the name of that entity.</b>	16:51
5	<b>expected under this agreement?</b>	16:49	5	A. No.	16:52
6	MR. GREIM: Objection, foundation, calls for	16:49	6	<b>Q. Okay. Is that because it's normally</b>	16:52
7	opinion.	16:49	7	<b>confidential; you don't disclose the dealings of</b>	16:52
8	THE WITNESS: No.	16:49	8	<b>private investigatory research clients that you're</b>	16:52
9	BY MR. GRENDI:	16:49	9	<b>working with Strategic Vision?</b>	16:52
10	<b>Q. Okay. I believe you testified before</b>	16:49	10	A. Correct.	16:52
11	<b>that you had heard that Team 2 found evidence of --</b>	16:50	11	MR. GRENDI: So, Attorney Greim, we can talk	16:52
12	<b>strike that.</b>	16:50	12	about whether you're going to try to use that in	16:52
13	<b>Did you ever hear that Team 2 of Strategic</b>	16:50	13	damages and we can talk about who this client is and	16:52
14	<b>Vision's team found evidence of Social Security</b>	16:50	14	find out information about it or you can -- we can	16:52
15	<b>number fraud or human trafficking or customs fraud?</b>	16:50	15	lay off on that and maybe talk to your client about	16:52
16	A. Say that again.	16:50	16	it.	16:52
17	<b>Q. Sorry. Did there ever come a time when</b>	16:50	17	MR. GREIM: Yeah. Let's just -- let's take	16:52
18	<b>you heard from Strategic Vision that its second team</b>	16:50	18	one minute.	16:52
19	<b>-- they call it Team 2 -- had found evidence of</b>	16:50	19	MR. GRENDI: Sure. Off the record.	16:52
20	<b>Social Security fraud, human trafficking, or customs</b>	16:50	20	VIDEOGRAPHER: Going off the record. The	16:52
21	<b>fraud concerning the subjects of the research</b>	16:50	21	time is now 4:54 p.m.	16:52
22	<b>agreement?</b>	16:50	22	[Mr. Greim confers with Ms. Wallop and Mr.	16:52
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1	A. Yes, but I don't hear the Team 2, that	16:50	1	Waller.]	16:54
2	term. I was not familiar with the Team 2.	16:50	2	VIDEOGRAPHER: We are back on the record.	16:54
3	<b>Q. Let's just say Strategic Vision. Did</b>	16:51	3	The time is now 4:57 p.m.	16:55
4	<b>Strategic Vision tell you it had found that kind of</b>	16:51	4	BY MR. GRENDI:	16:55
5	<b>information?</b>	16:51	5	<b>Q. So, Mr. Han, if you would please</b>	16:55
6	A. Yes.	16:51	6	<b>identify the client or potential client from Taiwan</b>	16:55
7	<b>Q. They did ever give you any documents to</b>	16:51	7	<b>that you spoke of politically concerning a newspaper</b>	16:55
8	<b>prove that or show that that was the case?</b>	16:51	8	<b>article in "Politico".</b>	16:55
9	A. No.	16:51	9	A. There is a -- I saw that article. I	16:55
10	<b>Q. No. Okay. And the whole point of this</b>	16:51	10	didn't know what it referred to. They specifically	16:55
11	<b>agreement was to get that, like you said, the</b>	16:51	11	talked about the Taiwan project?	16:55
12	<b>concrete evidence that there was corruption in the</b>	16:51	12	<b>Q. No, no. I'm sorry. You know what?</b>	16:55
13	<b>CCP. Right?</b>	16:51	13	<b>Let's strike that question. I'll start over.</b>	16:55
14	A. Correct.	16:51	14	<b>what is the name of the entity you and</b>	16:55
15	<b>Q. But that was never delivered under this</b>	16:51	15	<b>Strategic Vision have been working on that comes from</b>	16:55
16	<b>agreement, was it?</b>	16:51	16	<b>Taiwan? Who is that?</b>	16:55
17	A. No.	16:51	17	A. There are several. The Taiwan National	16:55
18	<b>Q. I'll ask about this one, but I think</b>	16:51	18	Security Council and Taiwan DPP, which is the ruling	16:55
19	<b>we're going to have to eventually go off the record</b>	16:51	19	party, and the embassy here.	16:55
20	<b>on it. What is the name of project in Taiwan that</b>	16:51	20	<b>Q. And is Strategic Vision trying to</b>	16:55
21	<b>you were talking about with Attorney Greim just</b>	16:51	21	<b>solicit business from those entities?</b>	16:55
22	<b>before the break?</b>	16:51	22	A. Correct.	16:56
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